Department of the Army Headquarters, US Army Transportation Center Fort Eustis, Virginia 23604-5000

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Installations – General Environmental Management

Summary. This regulation applies to environmental protection and enhancement at Fort Eustis and Fort Story. This is a new regulation that replaces the former Hazardous Material and Waste Management SOP; TCFE Pam 200-1, Integrated Solid Waste Management; TCFE Pam 715-1, Affirmative Procurement Program; Asbestos and Lead Paint Management SOPs; Policy Brief 200-6, Hazardous Substances Discharges/ Integrated Contingency Plan; and Policy Brief 200-7, Environmental Aboveground Storage Tank Program.

Applicability. This regulation applies to Active Army, Army National Guard, US Army Reserve, tenants, contractor activities, and lessees performing activities in support of the Army located on real property under Department of the Army jurisdiction. Contracts to operate Government-owned facilities shall reference this regulation and will designate by specific citation the applicable provisions of this regulation.

Availability. This publication is distributed on the Fort Eustis Public Folders and the DPW-ENRD web site, https://dpw-web.eustis.army.mil/ENRD/ENRDHome/index.htm.

Supplementation. Units may supplement this regulation, but may not make any provision more restrictive without prior approval from the Commander, US Army Transportation Center. No provision of this regulation creates or is intended to create a right or entitlement on the part of any person.

Suggested Improvements. The proponent of this regulation is the Director of Public Works, Fort Eustis. Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) through channels to Commander, US Army Garrison Command, Fort Eustis, VA 23604.

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Chapter 1 Introduction

1-1. Purpose. This regulation prescribes policies and procedures for conservation, protection, and enhancement of the environment at Fort Eustis and Fort Story and supported facilities.

1-2. Applicability.

- a. This regulation applies to all Active Duty, Reserve and National Guard Component commands and units (including tenant organizations), civilian agencies, contractors, and individuals (military and civilian) living, visiting or working on Fort Eustis. Except where specifically stated, the term "Fort Eustis" includes the Fort Eustis military installation and its sub-installation, Fort Story in the City of Virginia Beach.
- b. Some requirements in this regulation prescribe coordination, reports, and/or procedures that are specific to agencies and organizations located on the Fort Eustis installation. Agencies and organizations located on the sub-installation will contact the Fort Eustis environmental office for the requirement(s) applicable on the sub-installation.
 - c. Supplement to the regulation.
- (1) Commanders and directors of Fort Eustis and tenants may further supplement this regulation as appropriate to include policies and procedures that address specific sub-installation or command conditions/requirements. These supplements will be coordinated with ENRD, the proponent of this regulation.
- (2) McDonald Army Community Hospital (MACH), where stated in the regulation, is exe mpt from some installation requirements where unique medical conditions preclude or make compliance impractical. MACH will prepare a supplement to this regulation that includes internal compliance procedures applicable to its unique conditions. The supplement will be coordinated with the Environmental and Natural Resources Division (ENRD), Directorate of Public Works (DPW).
- d. US Army Reserve Centers and other DOD and non-DOD tenants will comply with this regulation which will be referenced under the provisions of their interservice support agreement with Fort Eustis.

- 1-3. References. See References section.
- **1-4. Explanation of Terms.** See Glossary section.
- **1-5.** Precedence of Federal, State and Local Environmental Laws and Regulations. This regulation implements the requirements of federal, state, regional and local environmental laws and regulations. Where there is a conflict between a requirement of this regulation and a current requirement of an applicable federal, state, regional or local law or regulation, the latter will have precedence for compliance.
- **1-6. Punitive Action.** Violation of many of the requirements in this regulation is punishable under federal, state, or local law. Military personnel are also subject to punitive action under the Uniform Code of Military Justice, and civilian personnel to disciplinary action within civilian personnel policies.

1-7. Federal Facility Environmental Compliance.

- a. Presidential Executive Order 12088, *Federal Compliance with Pollution Standards*, mandates federal agency compliance with federal, state, and local environmental requirements, including pollution control requirements. Violators can be held personally liable for cleanup costs and civil/criminal penalties; such persons include not only the actual individual who caused the violation, but also the supervisory (military and civilian) personnel who allowed the violation to occur and/or failed to take appropriate action to prevent or correct the violation.
- b. The Federal Facility Compliance Act (FFCA) subjects Fort Eustis' environmental programs to greater scrutiny by regulators, legislators and possibly the general public. Specifically, the FFCA:
- (1) Amends the solid and hazardous waste provisions of the Resource Conservation and Recovery Act (RCRA). It waives previous federal sovereign immunity under RCRA and allows state, county and local governments to impose substantive and procedural requirements; require payment of service charges, including fees; and impose fines and penalties on federal facilities for violations of solid and hazardous waste laws.
- (2) Requires the Environmental Protection Agency (EPA) to inspect all federal facilities annually. In addition, Virginia may conduct its own independent inspections. The cost for both inspections could be borne by the federal agency being inspected.
- c. Presidential Executive Order 13101, *Greening the Government Through Waste Prevention, Recycling and Federal Acquisition (also known as Affirmative Procurement Program)*, directs that federal facilities comply with the buy-recycled program established under section 6002 of the Resource Conservation and Recovery Act (RCRA).
- RCRA inspections or multi-media regulatory compliance inspections where RCRA compliance is a component of the inspection will include, where appropriate, evaluation of facility compliance with section 6002 of RCRA and any implementing guidance.
- d. Presidential Executive Order 13148, *Greening the Government Through Leadership in Environmental Management*, directs that federal agencies ensure all necessary actions are taken to integrate environmental accountability into day-to-day decision making and long-term planning processes, across agency missions, activities, and functions.
- e. The Emergency Planning and Community Right-To-Know Act (EPCRA) directs organizations to provide the Emergency and Hazardous Chemical Inventory (Tier Two) and Toxic Chemical Inventory (Form R) Reports.
- **1-8. Fort Eustis Environmental Policy.** The following statements define the broad Fort Eustis policy and are applicable to users of this regulation:
 - a. Comply with all applicable environmental policy, laws and regulations.
 - b. Identify potential sources of pollution and meet or exceed Army goals for prevention of pollution.

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- c. Assess the effects on the environment of activities, projects, training exercises, products, and services <u>before</u> implementation. Set objectives and targets to minimize adverse environmental impacts. Implement and monitor programs to achieve objectives and targets.
- d. Conserve and preserve natural and cultural resources so they will be available for present and future generations to use.
 - e. Restore previously contaminated sites as quickly as funds become available.
 - f. Promote continual improvement in our environmental management system.

1-9. Installation and Regulatory Agency Relationships.

- a. The Directorate of Public Works Environmental and Natural Resources Division (ENRD) is responsible for all coordination between Fort Eustis and regulatory agencies unless such coordination is handled by another organization through an established program approved by ENRD.
- b. ENRD will coordinate inspections and site visits of agencies having proper authority to evaluate or monitor compliance with environmental permits or regulations. Visitors will be accompanied by a member of ENRD and the Fort Eustis staff agency point of contact. Regulators' visits may be "no notice" inspections.
- 1-10. Permits. Fort Eustis must obtain recurring and one-time permits to meet environmental compliance requirements established by federal, state, regional or local regulatory agencies. All permit applications for the Fort Eustis installation and the sub-installation will be coordinated through ENRD. Ga rrison activities, Commanders, Reserve Centers and other tenants will be responsible for preparing applications for required permits. Permit application (or renewal) review by applicable federal, state and local regulatory agencies typically involves a lengthy review. Different types of permits vary as to the length of time these agencies require before denial or issuance of a given permit. Activities must accept these potential lengthy review periods and plan accordingly. Assistance is available from ENRD in preparing and reviewing permit applications. Copies of all final permits will be furnished to ENRD for filing and monitoring. See Appendix E for a discussion of wetland and coastal zone permits. Fort Eustis ant Fort Story both hold air, drinking water, and storm water discharge permits. Installation staff and tenant activities will not make interpretations on whether given permits are required. Proponents for actions/projects are not authorized to make interpretations as to whether permits are required. Proponents will coordinate with ENRD who will coordinate with respective regulatory agencies regarding the need for permits. Hardcopy responses from regulatory agencies must be obtained in order to determine whether permits are required.
- **1-11. Education and Training.** Major subordinate commanders and staff directors must ensure that soldiers and civilians performing duties which may affect environmental compliance or have the potential to cause environmental damage have adequate knowledge and skills to perform their missions in an environmentally sound manner. Appendix C lists the training available to activities.
 - a. Pollution prevention training requirements and responsibilities are in Appendix Q of this regulation.
- b. Training requirements for individuals performing functions associated with the management of hazardous material/hazardous waste (HM/HW), spill prevention & response, and responsibilities for conducting the training are stated in Appendix C of this regulation.
- c. Other environmental training such as environmental awareness, environmental impact assessment & documentation, and asbestos/lead-based paint management may be provided upon request.
- **1-12.** Environmental Audits. Fort Eustis will undergo both external and internal multimedia environmental audits in accordance with DA and TRADOC/NERO policy. The Environmental Compliance Assessment System (ECAS) is the program for external audits. ECAS will also evaluate an installations' Environmental Management System. Internal audits are conducted and reported through the Installation Status Report Part II (Environment). The internal and external audits will be conducted according to frequencies directed by DA and TRADOC/NERO policy.

Chapter 2 Responsibilities

2-1. Purpose. This chapter delineates staff responsibilities for the management of the environmental and natural resources program of Fort Eustis and Fort Story. The Commanding General, US Army Transportation Center and Fort Eustis, has overall responsibility for management of the environmental and natural resources, but specific staff responsibilities have been assigned as defined in the following paragraphs.

2-2. Garrison Activities.

- a. Directorate of Public Works (DPW). The DPW is the staff directorate responsible for managing environmental compliance, conservation, protection, restoration, and other environmental programs.
 - (1) The DPW will:
- (a) Provide fiscal and personnel assets to the extent these programs are funded necessary to accomplish environmental programs, and monitor management of those programs.
- (b) Ensure that DPW-ENRD participates in the review of all minor and MILCON construction and demolition projects during project scoping, concept and design phases to identify and incorporate environmental requirements in the project descriptions and/or contract specifications. For **all** of its minor construction and MILCON projects, the installation will achieve at least a bronze rating using the Corps of Engineers Spirit criteria.
- (c) Ensure that DPW-ENRD participates in the review of maintenance, utility, and service contracts (JOC, DPW Contract, DOL Contract, etc) to ensure that all FAR clauses related to environmental management are included.
 - (d) Provide status of energy and water use at the installation to the pollution prevention coordinator.
- (e) Housing and RCI Partner along with ENRD coordinate input on solid waste management for the Family Housing Occupant's Handbook.
- (f) Coordinate environmental information, to include asbestos, lead paint, radon, and solid waste management, with the housing area coordinators and/or RCI general partner.
- (g) Designate Chief, Fire and Emergency Services as Incident Commander in the event of an oil and/or hazardous chemical spill.
- (h) Designate DPW employees and contractors to attend annual environmental management training to include: basic, intermediate and advance environmental management training and spill response training for designated staff.
- (i) Ensure employees and contractors implement appropriate techniques for hazardous materials and oil spill prevention at their work areas.
- (j) Ensure the boilers located at Buildings 587, 801 and 2701 have qualified operators, good operating procedures and a maintenance schedule to comply with the installation's air permit to minimize emissions.
- (2) The ENRD, for the DPW, is the installation environmental office and is responsible for environmental program development and management. The ENRD will:
- (a) Serve as the point of contact for federal, state, regional, local and other agencies with regard to environmental matters.
 - (b) Coordinate and manage installation actions for implementing the provisions of this regulation.
- (c) Assess installation environmental compliance and achievement with DOD, DA, and installation environmental goals.

- (d) Perform required budgeting actions in support of the environmental program.
- (e) Provide input for Installation Status Report, Environmental Quality Report, and other installation reports, such as Master Plan and Installation Strategic Plan.
 - (f) Attend Command staff meetings, representing the Command environmental program.
- (g) Provide newcomer briefings as requested for CG, Chief of Staff, Garrison Commander and their respective Sergeants Major.
- (h) Assist installation program managers and military trainers in assessing potential environmental impacts of planned activities, and provide technical assistance for meeting environmental compliance requirements.
 - (i) Schedule and conduct the following environmental training:
- Advanced Environmental Management (AEM) training for AECs and HWCs; and provide standardized training modules for Basic Environmental Management (BEM), and Intermediate Environmental Management (IEM) training as listed in Appendix C.
 - Spill Prevention training as listed in Appendix C.
 - Oil spill response training and response exercises as listed in Appendix C.
 - Asbestos and lead-based paint training as listed in Appendix B1-3-4 and B2-2-1.
- Environmental awareness for OPD, NCOPD and other tenant activity training opportunities as listed in Appendix C.
 - Environmental planning, impact assessment and documentation training as listed in Appendix C.
 - Underground and aboveground storage tank training as listed in Appendix C.
- (j) Obtain data from the HazMarts at Fort Eustis and Little Creek Naval Base, which services Fort Story, to compile for EPCRA, Air Permits (Stationary Source Permit to Operate), and all other required environmental reports, and submit in accordance with report procedures and suspense dates.
- (k) Coordinate Fort Eustis hazardous chemical spill contingency planning and response in accordance with (IAW) the Integrated Contingency Plan (ICP). Plan and conduct an annual installation spill response exercise to test and review ICP procedures.
- (l) Manage the Integrated Solid Waste Program, which includes the operation of the Fort Eustis and Fort Story Hazardous Waste Accumulation Facilities and the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center, Fort Story Recycling Yard, and the Household Chemical Exchange.
 - (m) Manage air, drinking water, storm water, and waste water programs to insure compliance with permits.
- (n) Coordinate the sampling of buildings for the presence of asbestos and lead-based paint and maintain records of occurrence and abatement.
 - (o) Manage the Underground Storage Tank and Above Ground Storage Tank program.
- (p) Coordinate the pollution prevention program, which includes tracking chemical use, implementing strategies for reduction, and outreach activities.
 - (q) Coordinate the implementation of an Environmental Management System (EMS).

- (r) Manage the Natural Resource Program, which includes pesticide application, landscaping, fish and wildlife management, and forestry.
- (s) Coordinate the Installation Restoration Program, which is responsible for the clean-up of past contaminated sites.
 - b. Regional Directorate of Logistics (RDOL).
- (1) Supervises the partnership agreement with the Fleet and Industrial Supply Center to operate the Fort Eustis HazMart and the Little Creek Hazardous Material Control Center, which service Fort Story. (See TCFE Reg 700-1, Hazardous Material Management for more detail).
- (2) Ensure RDOL operations involving the use or handling of HM and Solid Waste, which includes hazardous waste, comply with appropriate regulations and with procedures in this regulation.
- (3) Ensure that RDOL paint booths and paint blast facility are maintained to comply with the installation's air permit to minimize particulate emissions. Report monthly paint usage (to include paints, thinners, primers and solvents used for the spray-painting operations) and amount of blast material collected at the Torit cartridge collection system to the ENRD Air Program Manager.
 - (4) Ensure compliance with the requirements in Appendix O, Ozone Depleting Chemicals.
- (5) Gather and report data on fuel use. Data will be reported annually to the Pollution Prevention coordinator.
- (6) Ensure compliance with the provisions of Appendix D, Environmental Planning, Impact Assessment and Documentation for all related projects and actions.
- (7) Ensure employees and contractors implement appropriate techniques for hazardous materials and oil spill prevention.
 - (8) Provide quantity and type of fuel used for transient vehicles.
- (9) Ensure that wood cyclone is maintained to comply with the installation's air permit to minimize particulate emissions. Report monthly the amount of material collected at the wood cyclone to the ENRD Air Program Manager.
- (10) Report monthly the operating hours of all stationary generators maintained by RDOL throughout the Post to comply with the installation's air permit. Reports are to be submitted to the ENRD Air Program Manager.
- (11) Report monthly the throughput of gasoline at Building 2734 in order to comply with the installations air permit. Reports are to be submitted to the ENRD Air Program Manager.
- (12) Ensure the fuel used at boiler plants 587, 801 and 2701 is distillate oil as defined; fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396-78, "Standard Specification for Fuel Oils". The maximum sulfur content shall not exceed 0.5 percent by weight per shipment. A fuel certification shall be obtained from the fuel supplier with each shipment of distillate oil for the above boilers. Each fuel supplier certification shall include the following:
 - (a) The name of the fuel supplier.
 - (b) The date on which the distillate oil was received.
 - (c) The volume of distillate oil delivered in the shipment.
- (d) A statement that the distillate oil complies with the American Society for Testing and Materials Specifications for numbers 1 or 2 fuel oil.

- c. Directorate of Plans, Training, Mobilization and Security (DPTMSEC).
- (1) Provide technical assistance to the ENRD in preparation of spill response plans and in the planning and conduct of spill response exercises.
 - (2) Coordinate all Integrated Training Area Management (ITAM) projects with ENRD.
- (3) Gather and report data on munitions expended in training on Fort Eustis. The data will be reported on a quarterly basis to the ENRD EPCRA Program Manager.
 - (4) Provide data on the fueling of transient aircraft quarterly.
 - (5) Support ENRD access to training areas.
- (6) Schedule US Army Reserve and National Guard units for hazardous material/oil spill prevention and response briefing given by ENRD prior to commencement of training or operations.
- (7) Inspect the Felker Airfield JP 8 Fuel facility in accordance with the USATC Integrated Contingency Plan and schedule fuel handlers for spill prevention training provided by ENRD at least annually.
- (8) Ensure compliance with the provisions of Appendix D, Environmental Planning, Impact Assessment and Documentation for all related projects and actions.
- (9) Ensure reserve and National Guard units, employees and contractors implement appropriate techniques for hazardous materials and oil spill prevention.
 - d. Directorate of Personnel and Community Activities (DPCA).
 - (1) Manage non-appropriated fund activities so that they are in compliance with environmental regulations.
 - (2) Provide game harvest data from post hunting program.
- (3) Provide gift certificates or other similar awards for the soldiers who participate in Earth Day and America Recycles Day activities.
- (4) Provide monthly pesticide use and annual inventory of pesticides stored at The Pines Golf Course and athletic fields.
- (5) Provide information about hunting and fishing opportunities at Fort Eustis to the military and civilian communities.
- (6) Ensure compliance with the provisions of Appendix D, Environmental Planning, Impact Assessment and Documentation for all related projects and actions.
- (7) Ensure employees and contractors implement appropriate techniques for hazardous materials and oil spill prevention.
- (8) Provide BOSS soldier support of the environmental program during Earth Day and/or America Recycles Day.
 - e. Public Affairs Office (PAO).
- (1) Inform the public and the Fort Eustis military community of Fort Eustis environmental programs, issues (i.e. spills), accomplishments, and awards.

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- (2) Advise the Commander concerning public hearings or public meetings regarding proposed Fort Eustis projects.
 - (3) Participate in annual spill training exercises.
- (4) Publish notices in The Wheel about aerial mosquito control and other pertinent environmental announcements.
 - f. Command Safety Office.
- (1) Provide the Site Safety Officer for spill response incidents, spill training exercises, and semi-annual hunter safety meetings. The Safety Officer will advise on safety and occupational health management issues.
- (2) Provide expertise in complying with safety requirements related to federal, state, regional, or local environmental regulations.
 - (3) Coordinate with the ENRD any environmental issues arising or discovered during safety inspections.
- (4) Provide life cycle management to include disposal of Radiological Waste for all ionizing radiation sources brought onto or leaving the installation. Consult the Safety document, TCFE 385-10, which covers handling and disposal procedures.
- (5) Establish policies and procedures for local implementation of the Hazard Communication Program and HazWOPER, First Responder Awareness Level to include training.
- (6) Serve as the command point of contact with the US Department of Labor-OSHA (USDOL-OSHA), state OSHA organizations and other federal, state, regional or local safety agencies.
- (7) Establish and serve as the staff proponent for safety and occupational health programs derived from USDOL-OSHA and other Army and Army -adopted safety and occupational health standards, as outlined in AR 385-10, as they apply to environmental matters.
 - (8) Participate in annual spill training exercises.
 - g. Staff Judge Advocate (SJA).
- (1) Provide legal advice and assistance in the interpretation of environmental statutes and regulations and other issues affecting the management of the environmental program.
- (2) Interface with the Department of Defense, Department of Justice, the United States Attorney, and state and local attorneys on all litigation or potential litigation concerning environmental issues.
- (3) Review environmental documentation required for Fort Eustis actions and other environmental documents and correspondence for legal sufficiency.
 - (4) Review environmental contracts.
 - h. Internal Review and Audit Compliance (IRAC).
 - (1) Provide cost benefits analysis as requested for environmental projects.
 - (2) Conduct audits of environmental programs as requested.
- i. Directorate of Resource Management (DRM). Provide support for all billing activity related to HazMart and Solid Waste Management to include Hazardous Waste Management.

- j. Provost Marshal Office (PMO).
- (1) Respond and investigate any environmental emergency and/or incident such as a fire, spill, explosion, discharge, and abandoned hazardous materials/wastes.
 - (2) Participate in annual spill prevention training exercises.
- (3) Respond to violations of environmental laws such as the Federal Facilities Compliance Act (FFCA), Clean Water Act (CWA), and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- (4) Provide enforcement of the Resource Conservation and Recovery Act (RCRA), Archeological Resource Protection Act, and Federal and State of Virginia Wildlife Protection regulations.
 - k. Directorate of Information Management (DOIM).
 - (1) Permit environmental information such as regulations and SOPs on the post web site.
 - (2) Coordinate connectivity among the web pages of installation activities to promote environmental awareness.

2-3. Subordinate Commands, Other Staff Directorates, and Facility Managers.

- a. Integrate environmental protection, conservation and enhancement activities into the planning and execution of the military mission to the fullest extent feasible. Plan projects and actions and coordinate such projects and actions with ENRD prior to their commencement to ensure appropriate level of environmental impact assessment and subsequent documentation are prepared in accordance with the National Environmental Policy Act (NEPA) and AR 200-2.
 - b. Implement the requirements of this regulation.
 - c. Participate in annual spill training exercises as requested.
- d. Ensure employees and contractors implement appropriate techniques for hazardous materials and oil spill prevention.
- e. Support affirmative procurement which includes the purchase of environmentally preferable products as directed in Appendix S.
- **2-4. Preventive Medicine Services (PMS), McDonald Army Community Hospital (MACH).** The PMS will provide Industrial Hygiene (IH) and related technical support for environmental program management. In coordination with the ENRD, the PMS will:
 - a. Conduct investigations, consultations, special studies and routine environmental surveys.
- b. Provide IH support during spill response action as requested by the Site Safety Officer, Fort Eustis installation response team.
 - c. Ensure the proper management of regulated medical wastes and mixed wastes generated by MACH activities.
- d. Assist in obtaining technical assistance from the US Army Center for Health Promotion and Preventive Medicine (CHPPM).
 - e. Support the installation pest management program.
- f. Maintain the pathological waste incinerator and train operators. Notify ENRD of any change in operating status of incinerator.

2-5. Northern Region Contracting Center – Installation Division.

- a. Support Affirmative Procurement (Presidential Executive Order 13101, Greening the Government through Waste Prevention, Recycling and Federal Acquisition and EO13148, Greening the Government Through Leadership in Environmental Management.)
 - b. Advise credit card holders of the installation prohibition for using credit cards to buy hazardous materials.
- c. Coordinate annual updates about hazardous material procurement and affirmative procurement with ENRD for the installation IMPAC Government Credit Card Guidelines.
- d. Ensure contracts contain environmental requirements (including FAR clauses relating to affirmative procurement), as applicable.
- e. Provide a contracting officer for inclusion in the Integrated Contingency Plan to provide emergency contract support for spill response.
- f. Provide on-line to all contractors the brochure titled, "Environmental Policies for Contractors at the US Army Transportation Center." Brochure is prepared by ENRD.
- g. Promote awareness to NRCC staff, other installation staff, and contractors about the on-line affirmative procurement training on NRCC web site.

2-6. Managers of GOCO Facilities.

- a. Comply with the environmental requirements of the existing contract and the provisions of this regulation.
- b. Prepare an environmental management plan for approval by DPW-ENRD and make revisions as needed.
- c. Document standing operating procedures as required to include environmental compliance and strategies to reduce waste and emissions for major processes.

2-7. Tenants, Federal and Non-Federal.

- a. Comply with installation policies, as well as legally applicable and appropriate federal, state, and local environmental laws. Tenants with Special Access Programs (Flight Concepts Division), or other sensitive activities, will have an Interservice Support Agreement with the installation. The ISA will address environmental oversight, to include funding and facility access.
 - b. Additionally, and as stipulated in the ISAs, tenants will:
 - (1) Pay environmental fines and penalties resulting from their activities
- (2) Immediately report spills or releases of petroleum products, non-petroleum oil, hazardous substances, non-hazardous waste, universal wastes, or hazardous waste to the Fire Department. Pay for disposal and waste containerization, excavation and removal of contaminated media, contract support fees and reimbursement of Fire & Emergency Services Division for consumable spill supplies associated with hazardous material or oil spill incidents for which they are responsible.
 - (3) Report all instances of non-compliance to ENRD within 24 hours.
- (4) Pay for its solid waste (trash), recycling and hazardous waste disposal costs if they are non-TRADOC/NERO tenants. TRADOC/NERO tenants will only pay for their hazardous waste disposal cost.
- (5) Pay the costs of separate environmental permits, fees, and unique costs associated with the environmental aspects of their operations. Tenants should program and budget for these requirements through their own chain of

command. Example: Permit which allows "stabbing" of beach for placement of causeways during training operations. Permits within the installation will be managed by ENRD, for example, the air permit will cover all paint booths, even if operated by tenants.

- (6) Ensure that the storage, treatment, and disposal of non-DOD hazardous material on the installations complies with 10 USC 2692.
- (7) Consistent with law and/or the procedures established in the ISA, provide representatives of regulatory agencies appropriate scheduled and/or unscheduled access to any facility or activity.
- (8) Provide data as requested by ENRD for the preparation of federal and Commonwealth of Virginia reports. This data may require information about chemical, compressed gas es, and munitions use.
- (9) Ensure employees and contractors implement appropriate techniques for hazardous materials and oil spill prevention.

2-8. Contracting Officer's Representatives (CORs), Contract Administrators, and Project Managers.

- a. Meet the AEC training requirements.
- b. Ensure contractors follow installation environmental regulations and SOPs. See References section of this regulation.
- c. Ensure that contract "Statements of Work" include the applicable environmental FAR clauses and other items from Appendix F.
- d. Ensuring contractors with contracts for more than one year, including option years, appoint a primary and alternate AEC.
- **2-9. All Activities.** All Garrison Activities, subordinate commands, other staff directorates, MEDDAC, DENTAC, GOCO facilities, federal and non federal tenants, Contracting Officers, Contracting Officer Representatives, contractors, and subcontractors must comply with the requirements of this section in addition to those listed above.
- a. Appoint and ensure training of appropriate activity personnel: Activity Environmental Coordinator (AEC), Hazardous Waste Coordinators (HWCs), Hazardous Waste Supervisors (HWSs), Hazardous Waste Handlers (HWHs), Hazardous Materials Handlers (HMHs), Universal Waste Handlers (UWHs) and Recycling Coordinators (RCs). See Appendix C for training requirements.
- (1) All Commands down to battalion or separate company/detachments, and Directorates down to division level will appoint and train one primary and one alternate Activity Environmental Coordinator (AEC). The AEC is the single point of contact for all activity environmental matters and is the Activity Recycling Coordinator. AECs must be in the grade of Warrant Officer (WO1) or above for military units, GS-11 or above for government civilians or equivalent, and appropriate management level for contractor personnel. AECs are required to have an Email address.
- (2) When the activity does not have a trained AEC, the Commander or Director having appointing authority for the AEC will sign all Container Contents Logs (CCLs). When the activity does not have a trained HWC, the Commander or Director having appointing authority for the AEC will sign all turn-in documents.
- (3) A Hazardous Waste Coordinator (HWC) and alternate will be appointed and trained for each Temporary Storage Site (TSS) and Satellite Accumulation Site (SAS.) HWCs must be in the grade of E-5 or above for military units, GS-5 or above for government civilians or equivalent, and appropriate management level for contractor personnel. HWCs must be trained before performing any HWC duties. HWCs may manage more than one site. This is a major additional duty and other additional duties should be limited. The HWC tasks, listed below, cannot be delegated to other personnel.

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- b. Duties of Activity Environmental Staff.
 - (1) The Activity Environmental Coordinator (AEC) will:
 - (a) Keep the chain of command informed on all environmental matters.
 - (b) Coordinate communications between ENRD and subordinates.
 - (c) Establish a system to track all inspections conducted at the subordinate Activity level and resolve findings.
- (d) Conduct quarterly inspections of all subordinate Activities IAW Appendix J. Ensure HM and Universal Wastes (UW) sites are inspected monthly, and HW sites are inspected weekly. Maintain Inspection files for at least 3 years.
 - (e) Assist the subordinate AECs and HWCs in managing their environmental programs.
- (f) Develop and/or maintain the hazardous material management program for their activities IAW this regulation, specifically this chapter and Appendices G, I, J, and K, including collecting and submitting subordinate units required quarterly Hazardous Material Inventory Reports IAW Appendix G, TAB 1, of this regulation.
- (g) Develop, if needed, a unit-specific Standing Operating Procedure (SOP) which will supplement the pertinent requirements of this regulation and coordinate this with ENRD. Assistance in developing the SOP is available from ENRD.
- (h) Facilitate the appointment of subordinate level Recycling Coordinators and ensure their training IAW Appendix C.
- (i) Coordinate new missions, new operations, construction, renovation, new system/equipment deployment, new system/equipment testing and evaluation, and training/exercise actions with ENRD to determine the level of environmental impact assessment and subsequent environmental documentation, required under the National Environmental Policy Act and AR 200-2.
 - (j) Sign the sworn certification on the Container Content Log when wastes are being turned-in.
 - (k) Manage and supervise subordinate level environmental training.
- (l) Coordinate with ENRD the registration of all personnel being assigned as AECs and HWCs by his/her activity. Ensure all TCFE 643 forms are correctly completed and turned-in by the published suspense date for each class.
- (m) Ensure UWs are appropriately managed IAW this regulation and that Universal Waste Handlers (UWHs) are trained IAW Appendix C. Maintain a list of all UW storage locations.
 - (2) The Recycling Coordinator (RC) will:
 - (a) Keep the chain of command informed on all recycling and solid waste matters.
 - (b) Coordinate communications between his/her activity and the AEC.
 - (c) Serve as the POC for all recycling and solid waste issues.
 - (d) Ensure that the activity receives information concerning recycling.
 - (e) Ensure that recyclables are properly sorted and ready for pickup.
 - (f) Ensure that recycling areas are neat and orderly.

- (g) Develop a plan in coordination with the AEC to ensure maximum participation by all personnel applicable to the activity.
 - (h) Screen materials to ensure that they are appropriate for turn-in for recycling.
- (i) Contact the Solid Waste, Recycle, and Pollution Prevention Center, Tel 878-4232, Building 1209 for Standing Operating Procedures (SOP).
- (j) Evaluate the contents of Solid Waste Dumpsters at least once a quarter by performing a "dumpster dive" in coordination with Solid Waste Recycling and Pollution Prevention Center, Building 1209.
 - (3) The Hazardous Waste Coordinator (HWC) will:
 - (a) Keep the chain of command informed on all environmental matters.
- (b) Inspect HW sites weekly every seven calendar days, and inspect HM and UW sites monthly. Maintain Inspection files for at least three years.
- (c) Develop, if needed, a unit-specific Standing Operating Procedure (SOP) which will supplement the pertinent requirements of this regulation.
 - (d) Ensure turn-ins of HWs & UWs are accomplished within the appropriate time limitations.
 - (e) Train activity HWSs, HWHs, HMHs, UWHs, and RCs.
 - (f) Be the Recycling Coordinator at this level.
 - (g) Order or purchase HM for the unit/organization.
 - (h) Maintain a register for HM orders and purchases.
- (i) Prepare or review Authorized Use List (a Hazardous Material Inventory) and request changes through coordination with ENRD.
- (j) Assist the AEC with developing and/or maintaining the activity's hazardous material management program IAW Para 2-7n (6) of this regulation.
- c. Hazardous Material Management. All activities are required to purchase all hazardous materials from the FE HazMart or from the Naval Amphibious Base (NAB) HazMin Center/Little Creek for Fort Story activities. Activities may not use credit cards or GSA accounts to purchase hazardous materials, unless the materials appear on the exemption list. Copies of the FE & FS USATC HazMart Informational Handbook may be obtained from the FE HazMart, Bldg 1205.
 - d. Hazardous Waste Management.
- (1) Fort Eustis and Fort Story are not permitted to receive hazardous or universal wastes generated off the installation. Under no circumstances will hazardous or universal wastes generated off post be brought onto post nor will hazardous or universal wastes be transported between Fort Eustis and Fort Story. FE/FS activities generating hazardous or universal wastes at other locations must comply with that installation's or host country's HWM regulations.
- (2) Manifest Signature Authority. Only personnel authorized in writing by the Commanding General can sign hazardous waste manifests, non-hazardous waste manifests, or bills of lading for non-hazardous waste. The Commanding General grants DPW-ENRD this authority and DPW-ENRD may grant this authority in writing to others as required on a limited basis. Activities must submit a list of personnel seeking authorization in writing as of

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January each year. This authorization is good for one calendar year only. Activities must ensure all training requirements are up-to-date or remove personnel from the list and notify DPW-ENRD immediately.

- e. Spills. Spills or discharges of hazardous materials or wastes must be reported to the Fire Department (911) IAW Appendix T.
 - f. Inspections. Activities are required to do weekly, monthly, and quarterly inspections IAW Appendix J.
- g. Funding. As required, all activities will fund sampling and analysis costs, spill clean-up and a prorated share to support operation of the Hazardous Waste Accumulation Facilities, and HazMart.

Chapter 3

Environmental Committees, Outreach and Environmental Excellence Awards

3-1. Purpose. This chapter establishes policy and procedures for the Environmental Quality Control Committee and discusses outreach activities which ENRD sponsors and uses to promote environmental awareness. It also lists awards that have been established to recognize excellence in environmental compliance and management.

3-2. Environmental Quality Control Committee (EQCC).

- a. Purpose. The EQCC advises the command on environmental priorities, policies, strategies, and programs. A subcommittee(s) will also perform management oversight for the implementation of an Environmental Management System.
- b. Organization. The EQCC consists of members representing the operational, engineering, planning, resource management, legal, medical, and safety interests of the Command, including military installation tenant activities.
- c. Meetings. Meetings are held at least semi-annually and the Commanding General and/or Garrison Commander will chair these meetings. Subcommittees will meet as required to accomplish their goals.

3-3. Restoration Advisory Board or Technical Review Committee.

- a. Background. Fort Eustis canvassed its surrounding communities for potential interest in establishing a RAB in 1997 and 1999. There was not enough interest to form a RAB. Due to the lack of community interest, qualified applicants from the canvassing were asked to participate in the Technical Review Committee (TRC).
 - b. Technical Review Committee
- (1) The Technical Review Committee (TRC) is a forum to facilitate communication and coordination; provide review and comments on Installation Restoration Program (IRP) activities; and facilitate regulatory and public participation. The law which requires federal installations to establish a TRC is 10 United States Code Section 2705(c) (SARA Section 211).
- (2) Members of the TRC include Fort Eustis, US Environmental Protection Agency (EPA) Region III, Virginia Department of Environmental Quality (VDEQ), US Fish and Wildlife Service, National Oceanic Atmospheric Administration (NOAA), Virginia Institute of Marine Science, City of Newport News Emergency Services, City of Newport News Wetlands Board, Virginia Department of Emergency Services, Virginia Department of Health, Virginia Marine Resource Commission and several members of the local community.
- (3) Meetings are held semi-annually with a written status/newsletter sent to each TRC member between meetings.

3-4. Local Emergency Planning Committee and Mid-Atlantic Coastal Area Committee.

- a. Local Emergency Planning Committees (LEPC). LEPCs are mandated by federal law and consist of representatives from local government, emergency planners and responders, federal facilities, military installations, private industry and citizens. Such committees serve two primary purposes. They are responsible for collection of information about hazardous substances stored or used at federal or private facilities with dissemination of such information to the community if requested. They are also charged with developing a contingency plan to deal with releases of hazardous substances originating from such facilities that may affect the local community. LEPCs are recipients of the installations' Emergency and Hazardous Chemical Inventory (also known as the Tier Two report as described in Appendix G of this regulation). This aspect, plus the importance of being a contributing member to the local area, represents the criteria for maintaining active membership on LEPCs.
- (1) Representation. The US Army Transportation Center participates on two LEPCs. ENRD represents Fort Eustis and Fort Story on the Peninsula LEPC and the Virginia Beach LEPC, respectively.
- (2) Attendance. LEPC meeting dates and locations may vary but usually occur two to four times per year. Representatives shall attend meetings in accordance with established LEPC by-laws.
 - (3) Participation.
- (a) Incorporating installation information into the LEPC contingency plan. Installation representatives shall be prepared to discuss hazardous material storage and use activities, Emergency and Hazardous Chemical Inventory reports, and contingency planning within the installation.
- (b) Other duties. Installation representatives may participate in other ways. This includes election to or volunteering to serve as an executive board member such as secretary, treasurer or special subcommittee chair. However, installation representatives are precluded from the positions of LEPC chairperson or vice chairperson. Other assistance may include participation in exercises or various subcommittees.
- b. Mid-Atlantic Coastal Area Committee (MACAC). The MACAC is a local organization charged with the responsibility of fostering cooperation among federal, state and local authorities, petroleum storage and distribution facilities, federal facilities, military installations, and private industry in petroleum and hazardous material spill prevention and contingency planning.
- (1) MACAC Region of Responsibility. The MACAC region is from southeastern Maryland (including the Eastern Shore), coastal Virginia (including the Hampton Roads area) and northeastern North Carolina. The MACAC is chaired by the US Coast Guard Marine Safety Office Hampton Roads and typically includes participation by the US Environmental Protection Agency Region 3, Virginia Department of Environmental Quality, representatives from Maryland and North Carolina, LEPCs, state and local emergency responders, private industry, military installations and federal facilities.
 - (2) Representation. ENRD represents both Fort Eustis and Fort Story on the MACAC.
- (3) Attendance. MACAC meeting dates and locations may vary but usually occur two to four times per year. Representatives shall attend all meetings.
 - (4) Participation.
- (a) Incorporating installation information into the MACAC Contingency Plan. Installation representatives shall be prepared to discuss hazardous material and petroleum storage and use activities, Emergency and Hazardous Chemical Inventory reports, and contingency planning within the installation.
- (b) Other duties. Installation representatives may participate in other ways. This includes election to or volunteering to serve as an executive board member or special subcommittee chair. Other assistance may include participation in exercises or various subcommittees.

3-5. Outreach.

- a. Earth Day. This celebration is part of a national event, held annually in April, to highlight environmental awareness throughout the United States and also on military installations. The event usually features an activity to foster soldier participation such as a foot race and/or musical entertainment. An environmental awards ceremony is also held at this time to honor soldiers and civilians who have supported the environmental program throughout the year, and the Commanding General signs an installation proclamation to support environmental stewardship. The event also encourages participation in the awards ceremony by local school children.
- b. America Recycles Day. This is another national event to promote recycling and the purchase of products with recycled content and occurs annually in late October. ENRD coordinates tours of the installation Solid Waste, Recycling and Pollution Prevention Center for local school children. It also promotes vendor displays of products with recycled content and conducts a competition with a recycling theme for soldiers. The Command awards prizes to the winners.
- c. ENRD Website. DPW-ENRD has a website which provides a variety of information about environmental programs such as drinking water, hazardous material management, and spill prevention. Copies of a variety of SOPs, flyers, and brochures are available for activities to download. The site also contains notices of special events and regulatory changes. The address is: https://dpw-web.eustis.army.mil/ENRD/ENRDHome/index.htm
- d. Flyers/Brochures. ENRD has prepared numerous flyers and fact sheets to promote environmental awareness. These are available at ENRD, Building 1407. Some are on-line at: https://dpw-web.eustis.army.mil/ENRD/ENRDHome/index.htm Topics covered in these brochures and flyers are: asbestos, drinking water, environmental policies for contractors, environmental risk assessment, green purchasing, hazardous materials and waste management, household chemical exchange, lead-based paint, and spill prevention.
- e. Administrative Record. Fort Eustis was placed on the EPA's National Priorities List (NPL) in 1994. According to Section 113 of CERCLA, Fort Eustis is required to establish an Administrative Record (AR) for the Fort Eustis NPL Site. An AR contains those documents that form the basis for selection of a response action and under Section 113 (j) of CERCLA, judicial review of any issue concerning the adequacy of any response action is limited to the contents of the AR. Additionally, the AR acts as a vehicle for public participation in the selection of a response action. The creation of a complete AR is an ongoing process; therefore, in the interim, the AR is referred to as an Administrative Record File (ARF). The ARF is required by CERCLA to be located at or near the site in order to ensure public access to the information regarding site cleanup activities. The copy of the Fort Eustis ARF can be found at: US Army Transportation Center, ATZF-PWE, Building 1407, Fort Eustis, VA 23604. Additionally, three information repositories are maintained at three local public libraries; Groninger Library, Building 1313, Fort Eustis, VA 23608; Christopher Newport University Library, 1 University Place, Newport News, VA 23606; and Grissom Public Library, 366 DeShazor Drive, Newport News, VA 23606.
- f. Other. ENRD coordinated the creation of a two-mile walking trail which begins behind Jacobs Theater and crosses Fort Eustis Lake to an overlook at Boy Scout Camp Training Area 7.

3-6. Fort Eustis Awards.

- a. Individual Environmental Excellence Award. This award, sponsored by the Environmental and Natural Resources Division, DPW, recognizes outstanding individual achievement in the area of environmental stewardship. The awards program can serve as a catalyst for environmental awareness and pride for the people who live and work on Fort Eustis and Fort Story. Some categories of good environmental stewardship are provided below:
 - waste reduction
 - recycling (paper, aluminum cans, cardboard, oil filters, waste oil, etc)
 - organizing unit environmental training events (spill prevention, hazardous waste handling)
 - participation in America Recycles Day and/or Clean The Bay Day
 - improvement of wildlife habitat
 - minimizing impacts of training operations to soil, vegetation, and wildlife
 - using measures to reduce erosion to shorelines and soils

- using measures to conserve water and energy
- using "green" products such as latex paint, re-refined oil, plastic lumber

ENRD staff review the nominations for appropriateness. Individuals are notified of their selections in mid-April and are invited to attend the Earth Day ceremony. Plaques are presented to winners by the Commanding General at the annual Earth Day Ceremony. Recommendations are solicited six to eight weeks before the annual Earth Day event and forwarded by e-mail to Haynes D@eustis.army.mil, by distribution to ENRD, Building 1407, Fort Eustis or nomination forms on ENRD web site (https://dpw-web.eustis.army.mil/ENRD/ENRDHome/index.htm) can be faxed to Tel 878-4589.

b. Best Installation Landscaped Sign. This is part of a Chief of Staff sponsored, Good Neighbor Award program, which is held annually in April. The competition has several categories for judging the quality of landscaping: best landscaped sign – installation activity; best landscaped sign - barracks; and the best landscaped yard - family housing occupants. ENRD provides the criteria for judging.

Chapter 4 Environmental Programs

4-1. Purpose. The purpose of this chapter is to provide an overview of the programs which the Environmental and Natural Resources Division manages. It also provides specific references to SOPs and other documents which detail the policy, regulatory requirements, and procedures associated with the environmental program areas.

4-2. Environmental Programs.

- a. Air. The installation air program addresses air quality issues associated with exposure to outdoor air pollutants. The purpose of this program is to manage air emissions to protect human health and the environment and to comply with all legally applicable and appropriate federal, state, and local air quality control regulations. This section covers air quality issues addressed by the Clean Air Act, as amended. Commonwealth of Virginia Department of Environmental Quality has issued to Fort Eustis a Stationary Source Permit to Operate and is in the process of issuing Fort Story a permit to operate. Appendix A contains additional information about the air program. Issues concerning asbestos and ozone depleting chemicals are addressed in Appendices B1 and O respectively. Radon is another component of the program. The Army conducted an extensive Radon Assessment Program in the 1990s. About 85 percent of priority 1 structures (day care centers, hospitals, schools, and living areas) were tested. The results indicated that no indoor structures required mitigation at Fort Eustis and Fort Story. Indoor radon levels will be tested in newly constructed units and in units not previously tested IAW AR Pam 200-1. EPR projects for radon testing have been submitted and testing will be conducted when environmental funds become available.
- b. Asbestos and Lead-Based Paint. The asbestos and lead-based paint programs consist of: facility survey/sampling records, survey/sampling services, asbestos/lead abatement, and the training program. There are survey/sampling records for most buildings on Fort Eustis and Fort Story. These records are usually comprehensive, including information on any asbestos or lead-based paint surveys that have been done, records of any samples that have been taken for lead or asbestos, and records of any abatement projects that may have been done. There is also a sampling contract for all types of asbestos and lead analyses that can be executed quickly. Abatement services are available through contract. Asbestos Awareness and Lead Awareness training are given annually. The asbestos and lead-based paint programs also features outreach initiatives, such as brochures and displays. See Appendix B1 and B2 for specific information about the program.
- c. Training. Training is an essential part of good environmental management practices and is required by law for some programs. ENRD has continued to provide annual training in a variety of environmental areas. These are: environmental planning, impact assessment & documentation, hazardous material and waste management, general pollution prevention, spill prevention, asbestos awareness and lead awareness. ENRD also provides, upon request, environmental awareness training for commissioned/warrant officer professional development, NCO professional development, and for staff in various Commands and directorates. Appendix B1, B2 and C provides more information about course offerings.

d. Environmental Planning, Impact Assessment and Documentation. The installation will plan and conduct peacetime mission activities to minimize adverse impacts on the environment. The National Environmental Policy Act (NEPA) requires Army decision makers to consider the environmental effects of their proposed programs, projects, and actions before implementation. In some cases the installation must develop written descriptions of these considerations and provide opportunity for public review. Army requirements for compliance with NEPA and its implementing Federal regulations are addressed in AR 200-2. Appendix D provides more information about this program.

Note: Tenant activities must comply with their on NEPA regulations and the Army regulation for any program which will be implemented on either installation.

- e. Permits. Fort Eustis must obtain recurring and one-time permits to meet environmental compliance requirements established by federal, state, regional or local regulatory agencies. Appendix E discusses Wetland and Coastal Zone permits and how to acquire them. Permits for Air (Appendix A), Drinking Water (Appendix W) and Storm Water (Appendix X) are discussed in other appendices as noted.
- f. Environmental Policies for Contractors. Contractors provide construction, maintenance and repair, utilities, and other services to the installation. Because they work on a government installation, they must meet all applicable environmental requirements. DPW-ENRD has prepared a brochure, which is in Appendix F and also available on the DPW-ENRD website, to assist contractors in identifying and meeting these requirements.
- g. Hazardous Material Management (EPCRA, Compressed Gases, Munitions, Transient Vehicle/Aircraft Fuel). Hazardous materials are those which pose a threat to human health and the environment if they are not properly managed. Proper management practices will be applied throughout the life cycle of research, development, procurement, production, use, handling, storage, and disposition of the hazardous material. The installation also applies best management practices, improved procurement practices and inventory control to prevent waste generation through material spoilage, shelf-life expiration or improper inventory control. Fort Eustis will also minimize use of hazardous materials through pollution prevention actions. See Appendix G for specific information about the program.
- h. Hazardous Waste Management (HWM). Hazardous Waste (HWs) are defined as solid wastes that pose a potential hazard to human health or the environment when not properly managed due to their ignitable, corrosive, reactive, or toxic properties. The Resource Conservation and Recovery Act, at the federal level, and the Virginia Hazardous Waste Management Regulations, at the state level, establish a management system for generators, transporters, and disposal facilities. These regulations provide for significant civil and criminal penalties for noncompliance. Training of personnel is the key to compliance! Fort Eustis and Fort Story are considered large quantity generators and must properly remove the HWs from the installation within 90 days of generation. HWs are generated by the use of Hazardous Materials (HM) which nearly every organization on the installation uses. However, not all HMs result in the generation of HWs. These are called Non-Hazardous Wastes and still must be properly managed to prevent pollution. A subset of HWs is Universal Wastes (UWs) which applies to batteries, lamps (fluorescent bulbs), some pesticides, and mercury -containing devices. This relaxation of some of the HWs regulations is meant to encourage recycling of these UWs; however if the UWs are not managed properly, they must then be handled like the more regulated HW. A key provision of the HWM program is Pollution Prevention (P2) which emphasizes the reduction in use of HMs, therefore reducing the generation of HWs, and minimizing the need for treatment and disposal. See Appendix C for training requirements and Appendix H for HWM.
- i. Container Management. Appendix I discusses how to order, store, reuse, and dispose of drums and other containers which hold wastes.
- j. Inspections. Inspections of various aspects of the environmental program are conducted by DPW-ENRD, Department of Army, Virginia Department of Environmental Quality, and the Environmental Protection Agency. DPW-ENRD has developed checklists to assist installation personnel in preparing for inspections by various regulators. Appendix J further discusses inspection requirements.

- k. Storage and Accumulation Site Management. Appendix K discusses the requirements for managing sites which are used for the storage and accumulation of hazardous materials, hazardous wastes, non-hazardous wastes, universal wastes, recycling materials.
- 1. Installation Restoration Program. The installation restoration program identifies, investigates, and cleans up contamination, resulting from past operations, on Fort Eustis and Fort Story. Fort Eustis is on the National Priorities List (NPL), which means that EPA considers it to need the highest priority for funds for remediation. ENRD has coordinated the investigation/remediation of 27 and 11 sites respectively at Fort Eustis and Fort Story. ENRD determined that eleven Fort Eustis sites and six Fort Story sites required no further action. The remaining sites have either undergone remediation or will be cleaned up in the next three to five years. Information papers about IRP program for Fort Eustis and Fort Story are located in Appendices L1 and L2.
- m. Natural Resources. Natural resources management includes the integrated and cooperative management of our nation's resources to provide for optimum biological diversity and multiple uses, consistent with conservation stewardship and the Army mission. The Army's policy and guidance on natural resources are described in AR 200-3 (formerly AR 420-74). TCFE Regulation 210-15, 30 August 2001, provides additional information about hunting and fishing regulations. See Appendix M for specific information about the program.
- n. Cultural Resources. The installation's goal is to manage the cultural resources under Army control in compliance with the Federal laws and in a spirit of stewardship of America's historic and cultural heritage. Cultural resources include those places, objects, documents, collections, and customs covered by public laws and regulations. Compliance with these laws will be integrated with NEPA compliance and with planning and execution of any undertakings, projects, activities or programs that may affect cultural resources. Appendix N provides more information about this program.
- o. Ozone Depleting Chemicals (ODC)/Substances. Management of these substances is necessary to reduce their releases into the atmosphere. These substances destroy the earth's ozone layer which protects life from damaging ultraviolet radiation. It is Army's and Installations' policy to minimize the procurement, use, and emissions of ozone-depleting chemicals (ODCs) to the greatest extent possible. The long-term goal is to eliminate ODCs altogether from the Army's use and inventory. See Appendix O for specific information about the program.
- p. Polychlorinated Biphenyls (PCBs). These are toxic chemicals which were commonly used in electric transformer dielectric fluids. Federal regulations banned their manufacture in 1979. Fort Eustis and Fort Story have eliminated all PCB and all PCB-contaminated transformers and switches. The installation continues to remove PCB ballasts associated with lighting fixtures from its buildings. See Appendix P for specific information about the program.
- q. Pollution Prevention. The purpose of pollution prevention is to reduce the environmental impacts associated with the Army's mission and to minimize the negative impact of environmental releases on worker health and safety. The installation prepares a pollution prevention plan every three years which serves as a framework for compiling information on hazardous material use and waste generation. It also documents best management practices, training, and environmental outreach programs to promote waste reduction. The components of pollution prevention management are: source reduction, reuse, recycle, and disposal. Appendix Q contains more information about the pollution prevention program.
- r. Solid Waste. Solid wastes are defined as any discarded material including materials which are abandoned, recycled, reclaimed, or accumulated speculatively. Examples include; household trash, discarded furniture, construction waste, yard waste, recyclables (aluminum cans, paper, cardboard, scrap metal, and tires). Hazardous Wastes, Universal Wastes, and Non-Hazardous Wastes are special categories of solid waste and are discussed in Appendix H. Radiological Wastes and Medical Wastes are managed by Post Safety and the MEDDAC respectively. ENRD uses an integrated approach to managing solid waste. This means it combines waste disposal along with a strategy for waste minimization by source reduction and recycling. This approach also includes affirmative procurement which promotes the use of recycled products in the manufacture of new items. See Appendix R for specific information about the program.

- s. Affirmative Procurement. Affirmative procurement (AP) is the name initially given to the buy-recycled purchasing program and has been extended to include the purchase of environmentally preferable products and biobased products. The federal government, as the country's largest purchaser of goods and services, has the ability to help create and stabilize markets for these types of products. The intent of the program is to also stimulate recycling by providing a market for new products manufactured with recycled materials. Environmentally preferable purchasing, or EPP, is the name of the US Environmental Protection Agency (EPA)'s program to encourage the purchase of products which have lesser or decreased effects on human health and the environment, when compared with competing products or services that serve the same purpose. A bio-based product is "a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials." Examples of bio-based products include vegetable-based lubricating oils, building construction panels made with straw or other agricultural fibers, and "tree-free" paper. These products often put materials to use that were destined for the landfill. Since they are usually made of "natural" materials with limited processing, they may also be less toxic and require fewer chemicals and less energy to produce. Appendix S contains information about the requirements of the program.
- t. Hazardous Substance Discharge. The Army policy is to prevent spills of oil and hazardous substances and to maintain readiness to respond rapidly to spills. A spill is defined as the unpermitted release to the environment of oil or a hazardous substance. Activity personnel are trained so they are familiar with actions to take to prevent spills. These are: proper storage of hazardous materials and wastes, procurement of hazardous materials only in the amount actually needed, accurate inventories of hazardous materials, use of secondary containment, protection of drains and water sources, and use of proper containers. See Appendix T for specific information about the program.
- u. Pesticides. Pesticides must be applied by trained and licensed personnel in accordance with the Fort Eustis/Story Pest Management Plan. Activities will obtain all approved pesticides and herbicides through the HazMart. Appendix U provides more detail about the use and application of pesticides on the installation.
- v. Underground and Aboveground Storage Tanks. Underground and aboveground storage tanks on the installation store petroleum products such as gasoline or heating oil. Underground storage tanks, which have a capacity over 110 gallons and above ground storage tanks, which contain over 550 gallons, are regulated. This means they must meet standards for corrosion protection, spill and overflow protection, installation, and leak detection. Appendix V contains specific information about the program.
- w. Water Resources Drinking Water. Fort Eustis and Fort Story purchase drinking water from Newport News and Norfolk, respectively. The water meets all of the requirements of the Safe Drinking Water Act (SDWA) and applicable state and local regulations. Drinking water provided for the field environment and other military-unique operations will meet the Army Surgeon General directives. Drinking water provided on Army watercraft will meet the drinking water quality standards of the SDWA. The installation will obtain and comply with all necessary Virginia Pollutant Discharge Elimination System (VPDES) permits, water appropriation and use permits, or other permits which may be required for the operation of drinking water treatment systems at both fixed and field facilities. ENRD prepares an Annual Drinking Water Quality Report for Fort Eustis and Fort Story. These reports are located on the installation web site, https://dpw-web.eustis.army.mil/ENRD/ENRDHome/Index.htm.
- x. Water Resources Storm Water and Waste Water. Storm water results from rain events which carry various sediments and pollutants to eventual discharge to surface water and/or ground water. Pollution prevention measures are used to control or eliminate sources of pollutants in storm water runoff. The installation generates waste water from both sanitary and industrial uses. Waste water is discharged into the sanitary sewer and is treated at plants operated by the Hampton Roads Sanitation District. The installation will obtain and comply with all necessary Virginia Pollutant Discharge Elimination System (VPDES) permits and use permits, or other permits which may be required for the discharge of storm water at both fixed and field facilities. Appendix X discusses specific information about the installation program.
- y. Noise. The installation noise policies are based on land use compatibilities as indicated by, objective noise levels. Under the environmental noise program, the installation will evaluate the impact of noise that may be produced by ongoing and proposed Army actions/activities, and minimize impacts and annoyance to the greatest extent practicable. The ongoing mission of Fort Eustis does not produce noise levels which are detrimental to the health and welfare of people on and off post. The noise impacts of new missions will be evaluated as necessary.

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THE COMMANDER:

ROBERT T. DAIL Major General, USA Commanding

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Appendix A

Air Pollution Management

- **A-1. Purpose.** This appendix provides policy, responsibilities and procedures for the control and abatement of air pollution.
- **A-2. Applicability:** The following is a list of activities which may have requirements contained in this appendix.
- a. Stationary and Fugitive Air Pollution Sources [e.g. boilers, spray painting operations (to include paint booths and abrasive blasting facilities), incinerators, engine testing facilities, stationary generators, fuel pumping stations, landfills, fuel storage tanks, and woodworking shops].
 - b. Burning, Outdoor and Indoor see paragraph 10

A-3. Key Applicable Regulations.

- a. The Clean Air Act (CAA) Amendments of 1990. The Act, 42 U.S. Code 7401-7671q, Public Law (PL) 101-549, is composed of seven major titles, each of which addresses specific aspects of the national air pollution control program.
- b. Other federal regulations that govern major Fort Eustis and Fort Story environmental programs contain provisions that pertain to air emissions.
- (1) The Resource Conservation and Recovery Act (RCRA) has several provisions which regulate air emissions including releases from hazardous waste storage, treatment, and disposal facilities, open burning and open detonation of explosive wastes.
- (2) The Toxic Substances Control Act (TSCA) requires certain wastes containing polychlorinated biphenyls (PCBs) to be burned in high efficiency boilers or furnaces for disposal.
- (3) The Comprehensive Emergency Response, Compensation and Liability Act (CERCLA) requires site remediation projects to comply with all the substantive requirements of other laws, including the CAA.
- (4) The Emergency Planning and Community Right-to-Know Act (EPCRA), also known as the Superfund Amendments and Reauthorization Act (SARA) Title III, requires the reporting of accidental releases to the environment of extremely hazardous substances, including air releases; and, when reporting thresholds for listed chemicals apply, requires annual reporting of releases from processes that use the chemicals, including air releases.
- c. Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, mandates compliance with federal, state and local regulations concerning air quality.
- d. The Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution, 9 VAC 5 Chapter 80.

A-4. Policy.

- a. Identify, control and monitor air pollution emission sources to ensure compliance with federal, state and local emission and ambient air quality standards, policies and plans.
 - b. Obtain required permits for the construction and/or operation of regulated sources.

- c. Obtain training and/or certification for operators of air pollution sources to comply with regulatory requirements and minimize emissions from those sources.
 - d. Cooperate with federal and state authorities in meeting objectives of pertinent air quality control plans.

A-5. Responsibilities.

- a. Directorate of Public Works (DPW) will exercise overall direction and coordination of the air pollution management program, and will execute the program through the Environmental and Natural Resources Division (ENRD). The ENRD will:
 - (1) Develop and disseminate policy on air pollution management.
- (a) Provide guidance on policy and regulations concerning air pollution sources management that reflects DOD and DA guidance, and pertinent provisions of air pollution control laws. Supplement and implement, as required, Federal Clean Air Act regulations and Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.
- (b) Maintain copies of all relevant federal, state, regional and local regulations; DOD and Army directives; and other pertinent documents on air emissions.
 - (c) Maintain air quality emission data for stationary air pollution sources.
 - (d) Maintain liaison with air quality control agencies and authorities.
 - (2) Provide overview of air pollution control projects.
- (a) Manage the identification, budgeting, reporting, engineering, design and construction of projects required to control and monitor discharges in accordance with applicable federal, state, regional and local air quality standards.
- (b) Ensure that all new stationary sources of pollutants and all major modifications to existing stationary sources are designed to meet or exceed applicable standards.
- (3) Obtain required state, regional and local air pollution permits, and submit reports required by pertinent air pollution regulations.
 - (4) Coordinate and monitor program execution.
- (a) Conduct and maintain up-to-date emissions inventories of stationary sources of air pollution located on the Fort Eustis and Fort Story, and respond to notifications of changes.
 - (b) Review emission data to identify and minimize or eliminate sources of air pollution.
- (c) Inform units and activities with sources of air pollutants of all required operations and maintenance upgrades.
- (5) Identify training requirements for air pollution compliance and coordinate for installation-level training to be provided as appropriate, including annual training on Operations and Maintenance Manual procedures for operators of selected air pollution sources.
- A-6. Stationary Air Pollution Source Construction, Installation, Modification, Movement, or Removal.

- a. New or Modified Sources. The proponent for the construction, reconstruction, installation, or modification of an air pollution source will coordinate with ENRD or the appropriate environmental office. Additional actions may be required prior to execution of the project.
- b. Permit to Construct and Operate. An application for a Permit to Construct and Operate must be submitted to and approved by the local air pollution control authority to construct, reconstruct or modify air pollution generating equipment/sources as per 9 VAC 5-80. The project proponent will insure completion and submission of these documents through ENRD or the appropriate environmental office.
- (1) Examples of equipment/sources requiring a Application and a Permit to Construct and Operate for approval include:
 - (a) Fuel burning equipment such as boilers, heaters, or generators.
 - (b) Refuse burning equipment such as incinerators.
 - (c) Process equipment such as air strippers, degreasers/parts washers, gasoline/avgas storage tanks.
- (d) Processes such as media blasting, dry cleaning, electroplating, fiberglass operations, soil venting, in-door spray painting operations, and woodworking/other material working equipment using a vacuum system to collect dust.
 - (e) Training equipment such as engine cells.
 - (2) Responsibility for obtaining the Permit to Construct and Operate.
- (a) Work done in-house: Coordination will be made with ENRD for project review and assistance in completing the application. ENRD will submit the application and obtain the Permit to Construct and Operate.
- (b) Work done by contractor: Coordination will be made with ENRD for project review and assistance in completing the application. ENRD will obtain the Permit to Construct and Operate.
- (3) Implement the Best Available Control Technology (BACT) as determined by the regulatory authority in the air pollution source design and construction/installation/operation.
- (4) Assure that all the standards/limits included in the Permit to Construct and Operate are implemented or met. This includes performance testing of the air pollution source, installing control equipment or monitoring equipment, and installing equipment that meets the specified emission limits.
- c. General Conformity Determination. 40 CFR Part 51 requires that the federal government evaluate the affect of specific criteria air pollutants generated by projects funded by the federal government or that occur on federal land. The criteria air pollutants that must be evaluated are those for which the project area is in maintenance or nonattainment. Fort Eustis and Fort Story are in maintenance areas for nitrogen oxides (NOx) and volatile organic compounds (VOCs). When the project will result in emissions of one or more of these pollutants:
- (1) A general conformity applicability analysis must be completed which examines the direct and indirect emissions produced by a project. If the requirements of the general conformity rule do not apply to a specific action, a Record of Non-Applicability (RONA) shall be prepared. A RONA is a short, written document which verifies that a proposed action has been reviewed properly, and provides written evidence of that review in the form of a project description, emission rate calculation (if necessary), citation of exemption category (if applicable) and any other information necessary to support the declaration of "non-applicability." ENRD will provide guidance and assist activities in preparing a RONA.

- (2) If the project emissions exceed the *de minimus* level for that pollutant or if the project does not qualify for one of the listed exemptions, a general conformity determination must be completed.
 - (3) Mitigative measures or emissions trading may be needed to continue the project.
- d. Removal or Movement of a Stationary Source. ENRD must be notified (878-4123) when a registered source of air pollution has been removed or planned for movement. The movement of a source may require one of the actions outlined under paragraph "b" above.

A-7. General Operating and Equipment Requirements for Stationary and Fugitive Air Pollution Sources.

- a. Owners/operators of air pollution sources must obtain the proper permits, if applicable, as outlined in paragraph 6 above.
- b. Owners/operators of air pollution sources must follow the Fort Eustis and Fort Story Stationary Source Permit to Operate and any additional applicable source specific permits. Fort Eustis was issued a Permit to Operate on 18 March 2002. As of 8 November 2002, Fort Story has not been issued a Stationary Source Permit to Operate. However, an application for a Permit to Operate has been submitted for Fort Story by the Commonwealth of Virginia Department of Environmental Quality. Contact ENRD (878-4123) regarding applicable permits.
- c. Owners/operators of affected air pollution sources identified in a permit must prepare and maintain an Operation and Maintenance (O&M) Plan. Guidance on preparation of O&M Plans is at paragraph 8 below.
- d. Any exceedances or violations by an air pollution source must be reported to ENRD or the appropriate environmental office verbally within one business day and written within three business days.
- e. Air pollution source operators must perform testing, monitoring, record keeping, inspections and reporting requested by ENRD or required by an applicable permit, or regulation.
 - f. All equipment must be maintained in good working order and operated following good industrial practice.
- g. Air pollution monitoring devices must be calibrated and maintained according to manufacturer's instructions, industry practice, regulation or permit.
- h. Monitoring gauges such as opacity, pressure differential monitors, and flow monitors will be marked with the permitted operating range as per manufacturer's instructions, industry practice, regulation, or permit.
- i. An air pollution source must not emit visible emissions (i.e. visible smoke from a stack or dust from a baghouse) exceeding the visible emission limit standard outlined in the permit or an applicable regulation.
- j. Waste derived fuel (e.g., used oil) must not be burned in any Fort Eustis or Fort Story air pollution source without prior coordination with ENRD (878-4123).
- k. Fugitive dust (created from projects such as construction, demolition, or material transfer) will be minimized by employing a technique such as water spray or a closed system. Fugitive dust must not be emitted from air pollution generating equipment such as boilers and incinerators.
- 1. An air pollution source must not emit air pollutants in such quantities and of such characteristics and duration which are likely to be injurious to human health, plant or animal life, property, or which unreasonably interfere with enjoyment of life and property.
- m. Persons must not conceal or mask the emission of an air pollutant, which violates air pollution regulations or causes a detriment to the health, safety, or welfare of any person.

A-8. Guidance for Preparations of O&M Plans.

- a. The Fort Eustis Stationary Source Permit to Operate issued by the Commonwealth of Virginia Department of Environmental Quality (DEQ) requires operators of equipment generating or controlling air pollution on Fort Eustis to take the following measures in order to minimize the duration and frequency of excess emissions (this will also apply to Fort Story when a Permit to Operate is issued):
- (1) Develop a maintenance schedule and maintenance records of all scheduled and non-scheduled maintenance.
 - (2) Maintain an inventory of spare parts.
- (3) Have available written operation procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- (4) Train operators in the proper operation of all such equipment and familiarize the operators with the written operation procedures. Training records shall be maintained to include the names of trainees, the date of training and the nature of the training.
- **A-9. Source Specific Operating and Equipment Requirements for Stationary Air Pollution Sources:** Fort Eustis' Stationary Source Permit to Operate lists the permitted equipment, operating requirements/emission limitations, records, and general conditions. A copy of the permit can be obtained from ENRD. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to constriction may result in enforcement action.

A-10. Outdoor Burning.

- a. Outdoor burning is not permitted unless prior coordination is made through ENRD.
- b. Prescribed burning by ENRD or other installation activity for maintaining fire dependent ecosystems or improving forestlands, for instruction in the methods of forest fire fighting, and to prevent or abate a forest fire hazard will not be conducted without coordination with appropriate federal, state and local agencies.

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Appendix B1

Asbestos

B1-1-1. Policy: The DPW policy is to identify all asbestos containing material (ACM) within its area of responsibility. Further, DPW will control or abate all asbestos that poses an immediate health hazard. Asbestos that is non-friable and does not create an immediate health hazard will only be abated in conjunction with other abatement, renovation or demolition projects. For major renovation projects (i.e. individual rooms or buildings as a whole), all friable asbestos material will be removed and, when economical, non-friable materials. For demolition projects, all asbestos material will be removed except for non-friable material that will not become friable during demolition, as defined by 40 CFR 61 Subpart M, paragraph 61.145.

B1-1-2. Applicable Regulations:

- a. Occupational Safety and Health Administration (OSHA) Regulations:
 - (1) 29 CFR 1926.1101, Construction Standard for Asbestos
 - (2) 29 CFR 1910.1001, General Industry Standard for Asbestos
 - (3) 29 CFR 1910.134, Respiratory Protection Standard
 - (4) 29 CFR 1910. 1200, Hazard Communication Standard
- b. Environmental Protection Agency (EPA) Regulations:
 - (1) 40 CFR 61 Subpart M, EPA National Emission Standard for Hazardous Air Pollutants (NESHAP)
 - (2) 40 CFR 763 Asbestos
- c. Commonwealth of Virginia Regulations: Where state or local jurisdictions regulate asbestos abatement programs these regulations will be followed in addition to those listed in this document. Where there is a discrepancy in requirements, the most stringent will apply.
 - (1) 18 VAC 15-20, Asbestos Licensing Regulations
 - (2) 16 VAC 25-20, Licensed Asbestos Contractor Notification, Asbestos Project Permits, and Permit Fee
 - (3) 16 VAC 25-30, Asbestos Emissions Standards for Demolition and Renovation
 - d. Army Regulations:
 - (1) AR 200-1, Environmental Protection and Enhancement, Chapter 8, Asbestos Management
 - (2) AR 11-34, The Army Respiratory Protection Program
- (3) TB MED 513, Occupational and Environmental Health Guidelines for the Evaluation and Control of Asbestos Exposure

B1-1-3. Definitions:

Abatement: Asbestos abatement includes the removal, enclosure, encapsulation or repair of asbestos containing

materials.

Asbestos: The term "asbestos" describes six naturally occurring fibrous minerals found in certain types of rock formations. "Asbestos" includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered.

Asbestos Containing Material (ACM): Any material containing more than one percent asbestos.

Category I nonfriable ACM: Asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy.

Category II nonfriable ACM: Any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the methods specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Class I asbestos work: Activities involving the removal of thermal system insulation (TSI) and surfacing ACM and pressured asbestos containing material (PACM).

Class II asbestos work: Activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III asbestos work: Repair and maintenance operations, where ACM, including thermal system insulation and surfacing material, is likely to be disturbed.

Class IV asbestos work: Maintenance and custodial activities during which employees contact ACM and PACM and activities to clean up waste and debris containing ACM and PACM.

Demolition: The wrecking or taking out of any load-supporting structural member and any related razing, removing, or stripping of asbestos products.

Disturbance: Contact which releases fibers from ACM or PACM or debris containing ACM or PACM. This term includes activities that disrupt the matrix of ACM or PACM, render ACM or PACM friable, or generate visible debris. Disturbance includes cutting away small amounts of ACM and PACM, no greater than the amount which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of ACM or PACM so disturbed exceed that which can be contained in one glove bag or waste bag which shall not exceed 60 inches in length and width.

Employee exposure: Exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment.

Friable Asbestos: Friable asbestos containing material refers to materials which when dry may be crumbled, pulverized, or reduced to powder by hand pressure. Friable asbestos containing materials are usually found on overhead surfaces, steel beams, ceilings, and occasionally on walls, pipes, and boiler lagging which were applied by spraying and troweling.

Non-Friable Asbestos: Non-friable asbestos material is material that cannot be easily crushed or broken. Non-friable asbestos containing materials are usually found in the form of roofing, flooring, and siding materials. NOTE: When previously non-friable asbestos becomes damaged to the extent that when dry it may be crumbled, pulverized or reduced to a powder during the removal, renovation, or demolition process, it should now be categorized as "friable" material.

Presumed Asbestos Containing Material (PACM): Thermal system insulation and surfacing material found in buildings constructed no later than 1980.

Regulated Area: An area established by the employer to demarcate areas where airborne concentrations of asbestos,

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tremolite, anthophyllite, actinolite, or a combination of these minerals exceed, or can reasonably be expected to exceed, the permissible exposure limit. Now, the construction and shipyard employment standards add that such area must be established also where Class I, II and III activities will take place, regardless of exposure levels.

Regulated Asbestos-Containing Material (RACM): Friable asbestos material, Category I nonfriable ACM that has become friable, Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

Removal: All operations where ACM or PACM is taken out or stripped from structures or substrates, and include demolition operations.

Renovation: The modifying of any existing structure, or portion thereof.

Repair: Overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates.

Surfacing material: Material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).

Thermal system insulation (TSI): ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

Time-Weighted Average (TWA): In air sampling, this refers to the average air concentration of contaminants during a particular sampling period. Generally, this is based on an 8 hour work day of a 40 hour work week.

B1-2. Responsibilities.

B1-2-1. Directorate of Public Works (DPW):

- a. Asbestos Management Coordinator:
 - (1) Overall responsibility and management of the Asbestos Management Program.
- (2) Maintains all records relating to asbestos identification, control and most removal actions. Daily removal notes will be maintained by the project supervisor for inclusion in the project folder.
 - (3) Maintains computer data base of asbestos sample results for all real property facilities.
- (4) Ensures information is updated and available so users, engineers, shop personnel, custodial and others can identify potential asbestos containing areas.
 - (5) Manages initial and follow-up asbestos surveys of all facilities.
 - (6) Takes or coordinates collection and submission of bulk samples of suspect materials for analysis.
- (7) Coordinates results of testing with Industrial Hygiene to ensure appropriate personal protective equipment, work practices, and access controls are being utilized.
- (8) Has the authority to regulate areas containing visible contamination which may pose a potential health hazard to building occupants or maintenance personnel. Information regarding such areas is forwarded to the Industrial Hygiene Section for review, monitoring, and comments addressing the health hazard. Coordinates results

of testing with Industrial Hygiene and ensures that proper warnings and access controls are issued to users and building occupants.

- (9) Provides summary copies of asbestos survey results and asbestos management plans to building users and/or DPW divisions required to perform maintenance or construction in a facility.
- (10) Reviews work requests to determine if work may involve the disturbance of any asbestos containing materials.
- (11) Reviews and approves asbestos abatement plans. Provides copies to Safety and Industrial Hygiene for compliance with OSHA regulations.
- (12) Completes pre-work Asbestos Caution forms for all work that may involve potential disturbance of asbestos containing material (ACM). These forms will be maintained in the Work Request folder.
- (13) Acts as clearing house and technical consultant for all asbestos actions. Abatement associated with work or demolition should be developed by the responsible DPW division and reviewed by the Asbestos Management Coordinator.
 - (14) Provides asbestos awareness training to DPW employees and other Post personnel.
 - (15) Maintains training requirements to be qualified as an Asbestos Inspector/Management Planner.
- (16) Coordinates with FSD and ESD to ensure proper marking of ACM in the field. Conducts random periodic inspections to ensure ACM and/or regulated areas_remain posted.
- (17) Surveys and inspects condition of asbestos in all facilities as needed. Per request, surveys and inspects reported damage to ACM.
 - b. Engineering Services Division (ESD):
- (1) Ensures adequate identification of asbestos containing material prior to the start of any construction project. Checks existing survey and testing records available from the Asbestos Coordinator. Requests additional asbestos testing by contractor or the Asbestos Coordinator, if required.
- (2) Provides the Asbestos Coordinator with the results of any contractor testing so that asbestos data may be updated.
- (3) Provides Asbestos Coordinator with results and documentation of all asbestos removal done through ESD contracts in order that asbestos data may be updated.
- (4) Forwards copies of asbestos abatement plans to the Asbestos Coordinator, Post Safety, and Industrial Hygiene for review and approval.
- (5) Ensures proper documentation, (e.g. State and Federal notification forms), is prepared and sent to proper authorities with copies to the Asbestos Coordinator prior to the start of any work.
- (6) Informs the Asbestos Coordinator of any asbestos fiber release incident so that proper response action may be taken.
 - (7) Documents that Division employees are properly trained in asbestos matters.
 - c. Business Management Division:

- (1) Processes work requests for self-help and troop projects.
- (2) Ensures that Self-Help projects are reviewed for possible disturbance of asbestos materials. After receiving a defined scope of work from Estimating, the work request is forwarded to the Asbestos Coordinator, or a designated asbestos qualified person, for review. An Asbestos/Lead Based Paint Caution form, (Form 6), will be filled out by the Asbestos Coordinator or designated asbestos qualified person, signed by the facility user, and filed in the project folder. The work request is then returned to the Estimator to determine the potential cost of the project, to include any asbestos removal necessary. All ACM subject to disturbance in such projects must be abated by asbestos trained and qualified personnel prior to turning the work over to the building occupants as a Self-Help project.
 - (3) Ensures adequate funding is programmed for asbestos abatement projects.
- (4) Ensures proper documentation (e. g. State and Federal notification forms) is prepared and sent to proper authorities with copies to the Asbestos Coordinator prior to the start of any work.
- (5) Informs the Asbestos Coordinator of any asbestos fiber release incident so that proper action may be taken to clean it up.
 - (6) Documents that required DPW employees are properly trained in asbestos matters.
 - d. Environmental and Natural Resources Division (ENRD):
 - (1) Review all work order requests for possible environmental impact, to include asbestos.
 - (2) Reviews asbestos abatement plans for compliance with environmental regulations.
- (3) Reports instances of environmental asbestos contamination to proper State, Federal and TRADOC authorities and ensures necessary cleanup actions are taken.
 - e. Facilities Support Division (FSD):
- (1) Requests through Chief ENRD, Asbestos Coordinator to check existing survey and testing records prior to any work that may disturb any asbestos containing material. Requests additional testing if area to work in is questionable.
 - (2) Post and secure asbestos contaminated areas as requested by the Asbestos Coordinator.
 - (3) Performs asbestos abatement and control work using Individual Job Order or Service Order.
- (4) Prepares and ensures proper documentation, (e.g. State and Federal notification forms), is sent to proper authorities with copies to the Asbestos Coordinator prior to the start of any work.
- (5) Informs the Asbestos Coordinator of any asbestos fiber release incident so that proper action may be taken to clean it up.
 - f. Family Housing Division (FHD):
- (1) Ensures that all new occupants are informed of asbestos containing materials within their quarters and of proper procedures to take to prevent accidental disturbance of such materials.
- (2) Informs the Asbestos Coordinator of any asbestos fiber release incident so that proper action may be taken to clean it up.

- g. Fire Prevention and Protection:
- (1) Informs the Asbestos Coordinator of any asbestos fiber release incident so that proper action may be taken to clean it up.
 - (2) Documents that employees are properly trained in asbestos matters.

B1-2-2. Post Safety:

- a. Informs the Asbestos Coordinator of any fiber release incidents so that proper action may be taken to clean it up.
- b. Reviews and approves asbestos abatement plans for compliance with OSHA regulations.
- c. Upon request, provides guidance on implementing 29 CFR to all appropriate activities.
- d. Conducts respirator fit testing for individuals participating in the installations respiratory protection program.

B1-2-3. MEDDAC:

- a. Industrial Hygiene:
- (1) Informs the Asbestos Coordinator of any fiber release incidents so that proper action may be taken to clean it up.
 - (2) Provides the Asbestos Coordinator with the results of all asbestos testing.
 - b. Occupational Health:
 - (1) Performs necessary medical exams as required in the asbestos medical surveillance program.
- (2) Provides Pulmonary Function Testing to Government employees participating in a respiratory protection program.
 - (3) Maintains medical records for Government employees.

B1-2-4. Northern Region Contracting Center (NRCC):

- a. Awards and administers contracts for asbestos removal and/or those requirements which contain some asbestos removal provisions. Further, will provide a final review of the specifications to assure asbestos removal provisions are included when appropriate.
- b. When informed of a fiber release incident by the vendor or inspector, assures the Asbestos Coordinator is notified so proper action may be taken for clean up.
- c. Insure that contracts dealing with such items as telephone line installation, utilities installation, computer data line insulation and exterminators have a requirement that contractors contact the asbestos management coordinator before starting work.

B1-3-1. Establishing Building Records for Asbestos Identification, Testing and Inspections:

a. IAW Army Regulation 200-1 Chapter 8, all Army structures located at Fort Eustis, Fort Story and area Army Reserve Centers were surveyed to determine the location, extent, and condition of asbestos containing materials.

TCFE Reg 200-6

During April 1993, DPW reviewed and accepted the final phase of this survey which was conducted by Dumas Engineering under contract number DABT57-91-C-0062. NOTE: This survey has its limitations because destructive sampling was not performed.

- b. These reports will be maintained in the permanent asbestos building files, along with any additional sampling results, sketches or drawings showing location of samples taken, removal projects, or renovations which have taken place in the facility. All asbestos records shall be maintained by the Asbestos Coordinator, ENRD, DPW, Fort Eustis, Virginia and made available upon request.
- c. Every fiber release incident that occurs or any changes in the condition of the building material shall be recorded. When unusual events occur at a work site, (for example, failure of pressure differential machine, rupture of temporary enclosures, etc.), there shall be a report submitted listing the events, persons affected, response, evaluation of results, and similar pertinent information. Protective measures and clean-up efforts taken shall also be included. Such information shall be reported on Form 2, and included in the asbestos building files.
- d. A periodic surveillance of buildings shall be performed by the facility manager to ensure that ACM are in good condition, are not damaged and findings of the inspection report do not differ. Surveillance of all ACM shall be conducted annually and documented by a written inspection report, Form 1. Any damage of the ACM shall be reported immediately to the Asbestos Coordinator and appropriate response action implemented as soon as possible.
- e. The results of the post wide survey and any additional sampling data collected by the Asbestos Coordinator or post Industrial Hygiene Section has been provided to building occupants to prevent the accidental disturbances of the materials. It should be understood that some areas may require additional sampling to fully identify all potential problems. As organizations relocate to other buildings, available asbestos survey information for the new locations should be requested through DPW.
- f. The Directorate of Public Works will maintain a delivery order type contract, managed by ENRD, for the testing of suspect asbestos containing materials and associated air samples. Request for sampling should be routed through the Asbestos Coordinator.
- g. Sampling results obtained from the delivery order type contract will be entered into the asbestos material data base. Samples collected by the DPW will also be entered into a sampling log book maintained by the Asbestos Coordinator.
- h. Additional surveys or more extensive testing required in order to ensure adequate identification of all asbestos material during design and prior to construction of maintenance and repair projects are the responsibility of the project manager. Contracts for additional surveys will be executed through Engineering Services Division (ESD) and funded by DPW. Additional asbestos samples collected by trained in-house personnel may be analyzed through the delivery order contract for testing, currently being managed by ENRD. Copies of all surveys and testing results will be provided to the Asbestos Coordinator for inclusion into the asbestos database. Copies of sample results that suggest a high hazard potential will be sent to the post Industrial Hygienist for further action.

B1-3-2. Procedure for Handling Hazardous Asbestos Areas:

- a. Potential hazardous asbestos areas are identified from asbestos surveys, tests, or reported to the asbestos coordinator as fiber release incidents of known asbestos materials.
 - b. Potential asbestos hazards will be logged in by the Asbestos Coordinator using Form 2.
- c. When deemed necessary, the Asbestos Coordinator may regulate access to hazardous areas to ensure the safety of works and building occupants. Information regarding such areas will be forwarded to the Industrial Hygiene Section for review of actions, monitoring recommendations, and comments addressing the health hazards.
 - d. The Asbestos Coordinator will notify the user of completed actions and when it is safe to return to the area. If

additional cleanup or abatement is required, the building user, appropriate DPW personnel, or the Asbestos Coordinator will submit a work order for required abatement work.

B1-3-3. Initial Notifications and Warnings:

- a. Building Occupants: Protocol shall be established for building occupants to report to the Directorate of Public Works, Asbestos Coordinator, any incidents where damage to ACM is obvious. Building occupants are not to disturb any ACM. Facility Maintenance personnel shall receive a two hour training course on Asbestos Awareness.
- b. Outside Contractors: Outside contractors such as telephone workers, utility workers, computer installers and exterminators shall be required to report to the Directorate of Public Works prior to beginning any work. Outside

contractors shall not be permitted to perform work in areas where ACM is physically contacted unless appropriate safeguards are taken, such as proper training and use of personal protective equipment.

- c. Asbestos Abatement Contractors: Prior to the start of any asbestos abatement activity, the contractor or project manager shall submit a work permit, Form [3], indicating the specific type and location of ACM, the amount of ACM to be removed, and general procedures for removal to the Asbestos Coordinator for review and approval. Asbestos abatement contractors shall report all activities to the Asbestos Coordinator and/or designated person for DPW. A final report, (Form 4), shall be submitted by the contractor to the Asbestos Coordinator upon completion of the work.
 - d. Federal, State, and Local Notifications:
- (1) When a renovation project results in the removal of at least 160 square feet or 260 linear feet of ACM, the appropriate government agencies shall be notified before work begins. Such notification is required under EPA National Emission Standards for Hazardous Air Pollutants (NESHAPS) and must be sent 20 days before the start of abatement. Notification is the responsibility of the asbestos abatement contractor. The notification shall be sent to the Virginia Department of Environmental Quality. Notification must be thoroughly documented. Copies must be provided to the Asbestos Coordinator. It is the responsibility of the Project Manager to ensure the abatement contractor forwards copies of notifications to DPW.
- (2) There shall be notification of any asbestos work to be performed in buildings where occupants could be exposed to a fiber release. This notification shall be in writing to the building supervisor and posted on the bulletin board of that building area. Signs shall be posted in the area where asbestos work is performed.
- (3) Other contractors shall be notified at the job site of the nature of the asbestos abatement activities, location of the asbestos containing material, and controlled access by O&M personnel. This notice shall be in writing complying with the Hazard Communication Regulation OSHA 29 CFR 1910.1200 and 1926.1101.
 - (4) Notify contractors/subcontractors of activities in immediate area.
 - (5) Notify utility companies.
 - (6) Notify building occupants.

f. Signs:

(1) Signs shall be posted to all asbestos abatement areas. Signs shall be 20 inch by 14 inch manufactured danger sign at each entrance to the work area displaying the following legend with letter sizes and styles of visibility required by 29 CFR 1926.1101.

DANGER

ASBESTOS

CANCER AND LUNG DISEASE HAZARD

AUTHORIZED PERSONNEL ONLY

RESPIRATORS AND PROTECTIVE CLOTHING

REQUIRED IN THIS AREA

- (2) Warnings are not intended to be publicly advertised but are designed as a last line of defense against inadvertent contact with ACM by unprotected individuals. These will be found conspicuously posted in mechanical closets containing damaged ACM, at the entrance and around the perimeter of all in progress abatement projects or contaminated areas that have been isolated.
- **B1-3-4. Training Requirements:** All personnel involved in asbestos work will be properly trained in accordance with applicable federal and state regulations.
- a. Asbestos Inspector/Management Planner: DPW will be responsible for maintaining an accredited asbestos inspector/management planner within the organization. The individual must have successfully completed a 40 hour asbestos inspector/management course approved by the EPA. Annual refresher courses must be complete in order to maintain accreditation.
- b. Asbestos Supervisor: All Class I & II asbestos work require an accredited/licensed Asbestos Supervisor to oversee the project. The individual must have successfully completed a 40 hour asbestos contractor/ supervisor training course approved by the EPA. Annual refresher courses must be completed in order to maintain accreditation.
- c. Asbestos Worker: All individuals performing Class I & II asbestos work are required to have successfully completed a 32 hour asbestos worker training course approved by the EPA. Annual refresher courses must be completed in order to maintain accreditation.
 - d. Operation and Maintenance Workers:
- (1) Maintenance employees shall be capable of recognizing ACM and trained in special techniques required in working around ACM. They should be responsible for notifying the manager of building maintenance if ACM is disturbed or damaged in any way. Trained staff shall perform routine inspections of ACM for progressive damage or deterioration. Complaints from the building occupants shall be reported directly to the manager of building maintenance who will then inform the Asbestos Coordinator of such complaints.

- (2) The maintenance and custodial staff conducting any Class III asbestos work, activities resulting in the disturbance of ACM, must successfully complete 16 hours of O&M training from an EPA approved school.
- e. Asbestos Awareness: Maintenance personnel, construction inspectors, engineers, or any individual that may be subject to working around ACM will be required to attend 2 hours of asbestos awareness training. Asbestos awareness training will be provided annually by DPW for its employees. DPW will also provide annual asbestos awareness training to facility managers or maintenance staff from other directorates that will be conducting periodic surveillance of ACM.
- **NOTE: Information regarding the location of ACBM will be made available for short-term workers, such as utilities workers and building repair and renovation contractors. Information may be requested from the Asbestos Coordinator, DPW.

B1-3-5. Asbestos Control Actions:

- a. Repair and Renovation Work Order Request System:
- (1) When Work Order Requests are submitted through DPW, the Project Review Committee will determine which projects will be conducted as Self-Help, in-house, or contracted out. After receiving a defined scope of work from the Estimator, the work request will be reviewed by ENRD to determine the potential for disturbance of ACM during the repair/renovation project. All ACM subject to disturbance in such projects must be abated by asbestos trained and qualified personnel prior to turning the work order over to the building occupants as a Self-Help project or DPW's shops as in-house projects.
- (2) Work Requests which are contracted out may or may not include asbestos removal as part of the contract. These Work Requests will be reviewed by ENRD in the same manner.
- b. Special Work Practices for Maintenance Activities: Even normal maintenance activities may disturb ACBM and raise the level of airborne asbestos fibers. Maintenance workers should avoid conducting any work as to disturb any ACM. It is the responsibility of the supervisor and the workers to check existing asbestos records prior to conducting any maintenance or repair activities.
- c. Building Demolition: Prior to any demolition, facilities must have had an asbestos survey conducted IAW VR 394-01-7, Virginia Asbestos Survey Standards for Buildings to be Renovated or Demolished. DPW and the demolition or renobation contractor will comply with the procedures specified in 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants; Asbestos NESHAP Revision, Final Rule.
- (1) Remove all regulated asbestos containing material (RACM) from a facility being demolished or renovated before any activity begins which would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal. RACM need not be removed before demolition if:
 - (a) It is Category I nonfriable ACM that is not in poor condition and is not friable.
- (b) It is on a facility component that is encased in concrete or other similarly hard material and is adequately wet whenever exposed during demolition; or
- (c) It was not accessible for testing and was, therefore, not discovered until after demolition began and, as a result of the demolition, the material can not be safely removed. If not removed for safety reasons, the exposed RACM and any asbestos-contaminated debris must be treated as asbestos-containing waste material and adequately wet at all times until disposed of.
- (d) They are Category II nonfriable ACM and the probability is low that the materials will become crumbled, pulverized, or reduced to powder during demolition.

B1-4. Operation and Maintenance Program.

B1-4-1. Introduction: This O&M program is not intended to be substituted for permanent, large scale abatement, but a safe, controlled method of working with ACM to prevent the emission of asbestos fibers into the air. Any O&M removal will be limited to operations where removal is secondary to another job, such as pipe fitting replacement and repair or electrical wiring, where contact with the ACM is either a possibility or a certainty. Any accidental damage to ACM by weather, physical means, leaking pipes, and etc., will be repaired in the same fashion. Any large scale, more than 20 LF a day or a single mechanical unit, ACM removal project will demand the use of a licensed abatement contractor following an approved asbestos abatement plan developed specifically for that project.

B1-4-2. Small Scale Versus Large Scale Disturbances:

- a. Small Scale: Work will be considered small scale, capable of being performed by individuals with Asbestos Operations and Maintenance training, when there is:
 - (1) Removal of less than 3 sq. ft. of surfacing material.
 - (2) Removal of no more than 3 LF of air cell pipe insulation less than 6 inches in diameter.
 - (3) Removal of no more than 3 LF of preformed plaster type pipe insulation less than 6 inches in diameter.
 - (4) Removal of less than 3 sq. ft. of boiler insulation.
 - (5) Removal of less than 3 sq. ft. of molded plaster pipe fitting.
 - (6) Drilling or otherwise abrading of no more than 3 sq. ft. of floor tile, cement asbestos board, etc.
- b. Large Scale: Maintenance activities which involve removal of more than 20 linear feet a day or a single mechanical unit will be considered to be large scale disturbances. Any large scale ACM removal project will demand the use of a licensed abatement contractor or DPW's in-house abatement team. All large scale removal projects will require the submission of an asbestos abatement plan developed specifically for that project. Abatement plans should be routed through the project engineer, Chief ENRD, ATTN: Asbestos Coordinator, Post Safety, and Industrial Hygiene for review and approval prior to the commencement of work.
- c. Other: Work which involves the removal of more material than specified as a small scale O&M repair, but less than a large scale ACM removal, will require the use of a licensed asbestos contractor. A detailed asbestos abatement plan will not be required, however, Forms 3 and 4 shall be submitted to the Chief, ENRD, ATTN: Asbestos Coordinator for approval and inclusion in the asbestos files.
- **B1-4-3.** Emergencies: In the event of an unexpected asbestos spill, the following procedures shall be implemented:
 - a. The occupants shall leave the area immediately, taking nothing with them.
 - b. The area shall be closed off to admit no one except the asbestos response team.
 - c. Signs shall be posted warning of the danger.
 - d. Verbal warnings shall be given to all other occupants in the building.
 - e. The Asbestos Coordinator shall be notified of the accident.
- f. The occupants of that area shall be moved to another area where they can be decontaminated and away from others to prevent further contamination.

- g. Industrial Hygiene or a contracted laboratory team shall suit-up to enter the room and place the area air sample pumps in the contaminated area.
- h. The area shall remain closed until the results of the bulk analysis and/or the air sample is analyzed to determine the extent of contamination.
 - i. The building occupants shall be notified of the accident that day if the results of the tests are positive.
- j. If the results are positive, then no further action shall be taken until the DPW gives the order to clean up the spill.
- k. DPW maintains an environmental testing contract with a local laboratory which can provide sampling and results within 24 hours. The testing contract is currently being managed by ENRD, Asbestos Coordinator.
- 1. If the results of the tests from the area are positive, the area shall remain closed until it is cleaned and the final air sample results are taken. All items in the area must remain in place until the area has been decontaminated.
 - m. Failure to comply with any of these rules and safety operations shall result in disciplinary action being taken.
- n. State and federal regulations are designed to protect the occupants of the location from exposure to asbestos. This program can work if all employees understand the danger of asbestos and the consequences of failure to follow these regulations.
- **B1-5-1. Asbestos Abatement and Removal:** Asbestos containing material is usually removed by contract. Whatever method is used, all federal and state regulations must be followed.
 - a. Contract removal:
- (1) Contract removal may be conducted by individual asbestos abatement contracts, as delivery order in a requirements contract, or as part of a related construction contract. All asbestos removal work will be administered by Engineering Services Division.
- (2) Contractors will be responsible for proper notification to state and federal agencies. Copies of this notification will be provided to the Chief, ENRD, ATTN: Asbestos Coordinator. The project engineer should also ensure that a copy is placed in the project folder.
- (3) Prior to the start of work, the contractor will submit an asbestos abatement plan to the DPW for approval. A copy of this plan will be sent to the Chief, ENRD, ATTN: Asbestos Coordinator for review and approval. The plan will also be forwarded to Post Safety Office and Industrial Hygiene for review.
- (4) Upon completion of the removal project, a report will be provided to the DPW, with a copy to the Chief, ENRD, ATTN: Asbestos Coordinator, detailing the ACM that was removed from the area abated.

B1-5-2. State and Federal Requirements:

- a. Commonwealth of Virginia Requirements:
- (1) The Commonwealth of Virginia requires notification to the Department of Labor and Industry at least 20 calendar days prior to the commencement of an asbestos project.
 - (2) The state notification form (Form 5) shall be used for all notifications.
- (3) All asbestos projects of 10 linear feet or 10 square feet or more must be reported to the Virginia Department of Labor and Industry; amounts less than these do not have to be reported. This waiver for reporting requirements for small jobs does not apply to the record keeping requirements of state regulations; therefore, records must be kept

regardless of project size.

- (4) Notification of less than 20 days may be allowed in case of emergencies. Notification for emergency removal projects must be submitted within 24 hours of initiation of the project. Emergency projects include but are not limited to:
 - (a) leaking or ruptured pipes,
 - (b) accidentally damaged or fallen asbestos that could expose non-asbestos workers or the public,
- (c) unplanned mechanical outages or repairs essential to work process that require asbestos removal and could only be removed safely during the mechanical outage. A written description of why this project is considered an emergency must be submitted on the notification. ** Lack of planning or inspection for asbestos before commencement of a general renovation project does not constitute an emergency project.**
 - (5) Amended notifications may be submitted for modifications.
- (a) Amended notices for start up dates must be received by at least one day prior to the removal date of the original notification. Submission of a re-notification shall be required after the original start date has passed.
- (b) Amended notices for extension of project completion dates must be submitted by the end of the completion date on the original notification. Submission of a re-notification for extension of completion dates shall be required after the original completion date has passed.
- (c) An amended notice must be submitted for any project which is completed prior to completion date indicated on the notification. This amended notice shall be submitted within 24 hours upon completion of the project.
- (d) An amended notice may be submitted when additional asbestos containing materials are discovered during the course of an on-going removal project.
 - (6) Any project cancellation must be reported to the state.
 - b. Federal Requirements (EPA-NESHAP):
- (1) In addition to reporting to the Department of Labor and Industry, projects of 160 square feet or 260 linear feet or greater must be reported to the U.S. Environmental Protection Agency.
 - (2) The Virginia notification form may be used for EPA notification.
- c. Demolition Projects: Demolition of any facility as defined by 40 CFR 61.141 must be reported to the Department of Labor and Industry and to the U.S. Environmental Protection Agency.
 - d. Addresses:
 - (1) Commonwealth of Virginia

Virginia Department of Labor and Industry Asbestos Program Powers-Taylor Building 13 South Thirteenth Street Richmond, VA 23219

Telephone # (804) 786-9865

FAX # (804) 371-7634

(2) EPA Region III

US Environmental Protection Agency Region III Curtis Building Sixth and Walnut Street Philadelphia, PA 19106 ATTN: Asbestos Coordinator

Telephone # (215) 597-1970 FAX # (215) 597-3156 or (215) 597-7906

B1-6-1. Packing and Labeling Waste:

a. Friable asbestos waste and contaminated materials, including plastic from enclosures, rags, mop heads, contaminated coveralls, respirator filters, etc., will be sealed in impermeable bags or two layers of polyethylene sheeting and affixed with hazard labels for disposal at a state approved landfill dump site. Labels will be affixed to all asbestos material, scrap, waste, debris and other products contaminated with asbestos in accordance with the DOT regulations and the OSHA Asbestos Standard. Caution labels will be of sufficient size to be clearly legible, displaying the following:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
AVOID BREATHING AIRBORNE ASBESTOS
RQ (ASBESTOS)
Class 9
NA 2212, III

b. In accordance with DOT regulations and 40 CFR 61.150, the bags will be labeled with the DOT class 9 symbol, the name of the generator and the location at which the waste was generated.

B1-8-2. Handling, Transportation, and Disposal:

a. The abatement contractor will mark vehicles used to transport asbestos waste during the loading and unloading of the waste so that a person can easily read:

DANGER

ASBESTOS DUST HAZARD

CANCER AND LUNG DISEASE HAZARD

- b. The hauling and disposal of asbestos waste will comply with 40 CFR 61, Subpart M, DOT regulations, and Virginia Solid Waste Management Regulations VR 672-20-10. Workers will wear appropriate respirators and personal protective equipment when handling asbestos material at the disposal site.
- c. Signs will remain until final cleanup is completed and the air monitoring indicates the area safe for reoccupancy. The contracting officer, or during in-house abatement projects the Asbestos Coordinator, will be notified before unrestricted entry in the area is permitted.
- d. Do not transport asbestos waste in the passenger compartment of any vehicle. Line the transporting area of the vehicle with polysheeting. Once asbestos waste has been unloaded remove polysheeting and dispose of as

contaminated asbestos waste.

e. Ensure all asbestos waste is properly documented from point of origin to the Central Accumulation Site to the final landfill. Documentation of proper disposal of asbestos waste at the landfill will be provided to the contracting officer within 3 working days after delivery.

PERIODIC SURVEILLANCE

Building
Reinspections by an accredited EPA AHERA Building Inspector shall be conducted once every three years beginning in:
year beginning in:
LOG OF INSPECTIONS
DATE TYPE OF INSPECTION PERFORMED BY

TCFE FORM 6035-ENRD-DPW (Jan 96)

RECORD OF ASBESTOS PROBLEM OR FIBER RELEASE EPISODE

This form is to be kept by the Asbestos Coordinator as documentation of both major and minor fiber release episodes or problems.

DIRECTIONS:	Record all information in the event of any fiber release episode or proble	m.
Date:	Facility No:	Reported
By:	Location/Description:	
Industrial Hygi	ene Notified: YES NO Date:	
	Preventive Measures Taken:	
	Notification Required: YES NO Date:	
Date:	Final Repair/Clean-up Method:	
Repairs By:		
Date completed	d and Facility Reopened:	

TCFE FORM 6030-ENRD-DPW (17 Jan 96)

ASBESTOS WORK PERMIT

Building Number: Date:
Location (specific rooms or area): Contact Name:Phone:
Description of work to be done:
By: In-house Contract Work Order No:
Estimated amount of asbestos involved:
State notification required: YES NO Personnel Protection required: YES NO Air monitoring required: YES NO See Industrial Hygiene
Special Requirements:
APPROVED: In-house Contract
DISAPPROVED: (Reason)
Asbestos Coordinator:Date:

1.

TCFE FORM 6032-ENRD-DPW (17 Jan 96)

ASBESTOS ABATEMENT FINAL REPORT

Building Number:		
Work Order Number:		
	Completion Date:	
Description and quantity of	asbestos materials removed (include sketch):	
Names of DPW personnel or	· Contractor involved:	
Attach copies of all air moni	toring results including final clearance.	
Signature of responsible pe	rson:	
Date:		

TCFE FORM 6033-ENRD-DPW (17 Jan 96)

VIRGINIA AND FEDERAL ASBESTOS PERMIT APPLICATION AND NOTIFICATION FOR DEMOLITION/RENOVATION

1	1
	7

ARI ILAD	CD.		
	MUDAR	NUMBER:	MI MARED.

1. TYPE OF NOTIFICATION:			ORIGINA	L	□ AMENDED	□ CAN	ICEL	O NESHAP
2. FACILITY INFORMATION: (facility	owner, remova	l, demoliti	on & other	contrac	tors)			
OWNER:								
ADDRESS:								
CITY:	STATE:			ZIP C	ODE:			
CONTACT:				TELE	PHONE #:			
REMOVAL CONTRACTOR:	AL CONTRACTOR:			LICE	NSE #:			
FEDERAL EMPLOYER IDENTIFICATI	ON NUMBER:			AVAIL -				
ADDRESS:								
CITY:	STATE:	10.1		ZIP C	ODE:			- // - //
CONTACT:				TELES	PHONE:		6 W	
DEMOLITION CONTRACTOR:		200	91 56		A			ATTICL STATE
ADDRESS:								
CITY:	STATE:	A ALTO		ZIP C	ODE:			
CONTACT:				TELER	PHONE #:			
OTHER OPERATOR:						is mai		
ADDRESS:								
CITY:	STATE:			ZIP C	ODE:			
CONTACT:				TELEI	PHONE #:			
3. TYPE OF OPERATION:	DEMOLITION	□ RENC	OVATION	O EME	ERGENCY RE	NOVATION	D ENCA	PSULATE
4. IS ASBESTOS PRESENT:	0	YES	□ NO					on the same
5. FACILITY DESCRIPTION (INCLUDE	E BUILDING N	AME, NUI	MBER AND	FLOO	R OR ROOM N	NUMBER):		
BUILDING NAME:								
STREET ADDRESS:				COUN	ITY;	611688		
CITY:	STATE:			ZIP C	ODE:	71 112		
SITE LOCATION:								
BUILDING SIZE:	# FLOO	RS:		AGE I	N YEARS:			
PRESENT USE:	Leanneste.		PRIOR U	SE:				
6. SCHEDULED DATES: REMOVAL	START: _			771577	FINISH:_			
REMOVAL TIMES:	DAYS OF O	PERATIO	N:	(MON	-SUN)			
	WORKSHIFT HOURS:		(MON	- FRI)				
				(SAT	- SUN) _			
7. SCHEDULED DATES: DEMOLITIO	A statement			-	FINISH; _		-	

ASBESTOS PERMIT APPLICATION AND NOTIFICATION FOR DEMOLITION/RENOVATION

8. PROCEDURE, INCLUDING ANALYTICAL METHOD, USED TO DETECT THE PRESENCE OF ASBESTOS;

INSPECTOR:	VA. CERTIFICA	ATION #:	
9. ACM TO BE REMOVED	AMOUNT	10. ACM NOT REMOVED	
DESCRIPTION	Amount	DESCRIPTION	AMOUNT
PIPE	LNFT	FRIABLE	F
SURFACE AREA	SQFT	CATEGORYI	F
VOL. ACM OFF FACILITY (NESHAPS)	CUFT	CATEGORY II	F
11. DESCRIPTION OF PLANNED DEMOLITION	N OR RENOVATION WORK, AND METH	IOD(S) TO BE USED:	
12. DESCRIPTION OF WORK PRACTICES AN ASBESTOS AT THE DEMOLITION AND RE		SED TO PREVENT EM	ISSIONS OF
13. WASTE TRANSPORTER #1; NAME:			
ADDRESS:			
CITY:	STATE:	ZIP CODE:	
CONTACT:	TELEPHONE:		
WASTE TRANSPORTER #2: NAME:			ALTHUR ALLERS
ADDRESS:			
CITY:	STATE: ZIP CODE:		
CONTACT:	TELEPHONE:		
14. WASTE DISPOSAL SITE: NAME:			
LOCATION;			
CITY:	STATE: ZIP CODE:		
TELEPHONE:	LANDFILL PERMIT #:		
15. IF DEMOLITION ORDERED BY A GOVER	NMENT AGENCY, IDENTIFY THE AGEN	ICY BELOW:	
NAME:	TITLE:		
AUTHORITY:		10	
DATE OF ORDER:	DATE ORDERED TO BEGIN	4:	
16, FOR EMERGENCY RENOVATIONS:			
DATE AND HOUR OF EMERGENCY:	TIME:		
DESCRIPTION OF THE SUDDEN, UNEXPECT	ED EVENT:		
EXPLANATION OF HOW THE EVENT CAUSE	D UNSAFE CONDITIONS OR WOULD O	AUSE EQUIPMENT DA	MAGE

17.

DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR

CREDIT CARD TYPE: (CHECK ONE)

CARD#

AUTHORIZED SIGNATURE:

IT VISA

☐ MASTERCARD

ASBESTOS PERMIT APPLICATION AND NOTIFICATION FOR DEMOLITION/RENOVATION PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER: 18. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THE NESHAP REGULATIONS WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE AT THE PROJECT SITE FOR INSPECTION, (40 CFR PART 61, SUBPART M, REQUIRED AFTER NOVEMBER 20, 1991) SUPERVISOR: LICENSE #: PROJECT MONITOR: LICENSE #: PROJECT DESIGNER: LICENSE #: LABORATORY: LICENSE #: SIGNATURE OF OWNER/OPERATOR ______ DATE: ___ I CERTIFY THAT THE INFORMATION SUBMITTED IS ACCURATE TO THE BEST OF MY KNOWLEDGE AND THAT 19. ACCREDITED PERSONS ARE BEING USED ON THIS PROJECT. NAME: _ TITLE: SIGNATURE: DATE: 20. AMOUNT OF ASBESTOS FEE SUBMITTED: \$_ An asbestos project permit fee shall be submitted with the completed project notification. The fee shall be in accordance with the following schedule unless a blanket notification (as described below) is granted. \$50 for each project equal to or greater than 10 linear feet or 10 square feet up to and including 260 linear feet or 160 square feet. \$160 for each project equal to or greater than 260 linear feet or 160 square feet up to and including 2. 2600 linear feet 1600 square feet. \$470 for each project of more than 2600 linear feet or 1600 square feet. 3. 4. If the amount of the asbestos is reported in both linear feet and square feet the amounts will be added and treated as If the total were all in square feet for this subsection. \$15 for each amended notification. A blanket notification, valid for a period of one year, may be granted to a contractor who enters into a contract for asbestos removal or encapsulation on a specific site which is expected to last one year or longer. Address all notifications as described below: ASBESTOS PROGRAM DEPARTMENT OF LABOR AND INDUSTRY POWERS-TAYLOR BUILDING 13 SOUTH THIRTEENTH STREET RICHMOND, VA. 23219 FAX (804) 371-7634

EXP. DATE:

ASBESTOS AND LEAD-BASED PAINT CAUTION FORM

PROJECT NUMBER:
FACILITY:
WORK DESCRIPTION:
DPW has completed a survey in accordance with Army Regulation 200-1, which requires that all Army
structures be surveyed to determine the location, quantity and condition of any asbestos containing materials (ACM). A similar survey will be conducted to evaluate the extent of lead-based paint (LBP) in selected facilities. This information will be provided to building occupants to prevent the accidental disturbance of these materials. It is understood that some areas may require additional sampling to fully identify all potential problems.
The following materials have been identified in your facility:
I, the undersigned, hereby verify that I have been informed of the presence or possible presence of asbestos containing material and/or lead-based paint in this facility.
Prior to working in the facility of known or assumed asbestos containing material and/or lead-based paint, I shall notify DPW, obtain approval and follow procedures designed to protect myself, other building occupants, and the environment.
I fully understand that the materials mentioned above must not be disturbed, removed, or altered in any fashion. Work which requires the disturbance of ACM or LBP must be accomplished by properly trained and licensed personnel. Coordinate with DPW to ensure the material is handled and disposed of in accordance with all appropriate Federal/State laws and regulations.
Name of Requestor(please print)
Signature
Organization Telephone number

Appendix B2

Lead-Based Paint Management

B2-1-1. Policy: The installation policy is to identify and manage all lead-based paint materials within its area of responsibility. Further, DPW will manage or abate all surfaces that contain lead-based paint materials which pose an immediate health hazard. This includes lead-based paint and lead-contaminated dust in target facilities and public buildings (interior and exterior surfaces), exterior painted structures (such as playground equipment), and contaminated soil.

B2-1-2. Applicable Regulations:

- a. Occupational Safety and Health Administration (OSHA) Regulations:
 - (1) 29 CFR 1910.1025, Lead Standard (Subpart Z Toxic and Hazardous Substances)
 - (2) 29 CFR 1910.134, Respiratory Protection Standard
 - (3) 29 CFR 1910.1200, Hazard Communication Standard
- b. Environmental Protection Agency (EPA) Regulations:
 - (1) 40 CFR Part 745, Lead-Based Paint Poisoning Prevention
 - (2) 40 CFR 260-280, Hazardous Waste Management
 - (3) 49 CFR 100-178, Hazardous Materials Transportation
- c. Commonwealth of Virginia Regulations:
 - (1) 18 VAC 15-30, Virginia Lead-Based Paint Activities Regulations
 - (2) 9 VAC 20-60, Virginia Hazardous Waste Regulations
- d. Army Regulations:
 - (1) AR 11-34, The Army Respiratory Protection Program
 - (2) AR 40-5, Preventive Medicine
 - (3) AR 200-1, Environmental Protection and Enhancement
 - (4) AR 200-2, Environment Effects of Army Actions
 - (5) AR 420-70, Buildings and Structures
- e. US Department of Housing and Urban Development: Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, June 1995.

B2-1-3. Definitions:

Abatement: Any set of measures designed to correct and eliminate lead-based paint hazards. Abatement includes the <u>removal</u> of lead-based paint and lead-contaminated dust, the permanent containment or <u>encapsulation</u> of lead-based paint, the <u>replacement</u> of lead-painted surfaces or fixtures, and the removal or covering of lead-contaminated soil. Abatement also includes all preparation, cleanup, worker protection, disposal, and post-abatement clearance testing activities associated with such measures.

Accessible Surface: Any protruding interior or exterior surface that a young child can mouth or chew.

Containment: A process for protecting workers and/or the environment by controlling exposures to lead dust or debris created during abatement.

Certified Contractor:

- (1) A contractor, inspector, or supervisor who has completed a training program certified by the appropriate Federal agency and has met any other requirements for certification or licensure established by such agency or who has been certified by any State through a program which has been found by such Federal agency to be at least as rigorous as the Federal certification program; and
- (2) Workers or designers who have fully met training requirements established by the appropriate Federal agency.

Deteriorated Paint: Any interior or exterior paint that is peeling, chipping, blistering, flaking, worn, chalking, cracking or otherwise becoming separated from the substrate..

Disposal Facility: A facility or part of a facility at which hazardous waste is intentionally placed into or on any land or water, and at which the waste will remain after closure.

Encapsulation: A method of abatement that involves the coating and sealing of surfaces with durable, paint-like coatings specifically formulated to be elastic, long-lasting, and resilient to cracking, peeling, algae, and fungus so as to prevent chalking, flaking, lead-containing substances from becoming part of house dust or accessible to children.

Enclosure: The resurfacing or covering of surfaces, and sealing or caulking with durable materials so as to prevent or control chalking, flaking, lead-containing substances from being part of house dust or accessible to children.

Environmental Command Council: The Environmental Command Council (ECC) serves as an environmental advisor to the command and monitors the Fort Eustis and Fort Story overall environmental management program. The ECC reviews environmental policy, facilitates coordination and solves environmental problems. The ECC is comprised of members and Activity Environmental Coordinators (AECs) representing each command, directorate or tenant activity at the United States Army Transportation Center (USATC).

Hazardous waste: By-product of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. It is a solid waste, which possesses at least one of four characteristics (ignitability, corrosivity, reactivity, and toxicity), or appears on special EPA lists. A hazardous waste is regulated under Subtitle C of RCRA. The regulatory definition of hazardous waste is found in 40 CFR 261.3.

High Efficiency Particulate Air (HEPA) Filter: A filter capable of filtering out particles of 0.3 microns or greater from a body of air at 99.97 percent efficiency or greater.

In-place Management: An abatement strategy which reduces exposure to lead by encapsulating, covering, or enclosing surfaces containing lead-based paint. This process leaves the lead in place but protects occupants by reducing the chance of exposure.

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Inspection: A surface by surface investigation to determine the presence of lead-based paint as provided in Section 302 (c) of the Lead-Based Paint Poisoning Prevention Act and the provision of a report explaining the results of the investigation.

Interim Controls: A set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards, including specialized cleaning, repairs, maintenance, painting, temporary containment, ongoing monitoring of lead-based paint hazards or potential hazards, and the establishment and operation of management and residential education programs.

Lead-Based Paint: Lead-based paint is any paint in which the nonvolatile content of the liquid paint contains more than six one-hundredths of one percent (0.06%) lead. When testing existing paint on surfaces, lead-based paint is any paint which tests equal to or greater than 1.0 milligram/cm² lead when using a X-ray Fluorescence analyzer or 0.5% lead by weight when using Atomic Absorption Spectroscopic analysis.

Lead-Based Paint Hazard: Any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health.

Lead-Contaminated Dust (wipe standards):

Floors = $> 40 \text{ micrograms per ft}^2$

Window Sills = > 250 micrograms per ft²

Window Wells = > 400 micrograms per ft²

Replacement: A strategy of abatement that entails removing components such as windows, doors, and trim that have lead-painted surfaces and installing components free of lead.

Resource Conservation and Recovery Act (RCRA): The Federal statute that regulates the generation, treatment, storage, disposal, recycling, or transportation of solid and hazardous waste.

Risk Assessment: An onsite investigation of a residential dwelling to discover any lead-based paint hazards. Risk assessments include an investigation of the age, history, management, and maintenance of the dwelling, and the number of children under the age of six years and women of childbearing age who are residents; a visual assessment; limited environmental sampling (i.e., collection of dust wipe samples, soil samples, and deteriorated paint samples); and preparation of a report identifying acceptable abatement and interim control strategies based on specific conditions.

Target Facilities: Government owned or leased facilities constructed prior to 1978 which are used regularly by children six years old or younger or by pregnant women as family housing, child development centers, family child care homes, schools, playgrounds, and similar facilities. Facilities constructed or included in whole-house revitalization or similar major rehabilitation projects since 1978 are considered free of lead-based paint if all paint coatings were removed or replaced.

Toxicity Characteristic Leaching Procedure (TCLP): Required test under RCRA to determine the toxicity and mobility of a waste's hazardous constituents.

X-ray Fluorescence Spectrum Analyzer (XRF): An instrument that determines lead concentration in milligrams per square centimeter (mg/cm²) using the principle of x-ray fluorescence.

B2-2. Responsibilities.

B2-2-1. Directorate of Public Works (DPW):

- a. Lead-Based Paint Management Coordinator (LBPMC):
 - (1) Has overall responsibility and management of the Lead-Based Paint Management Program.
- (2) Maintains all records relating to lead-based paint identification, control and most removal actions (with the exception of medical/health records).
- (3) Enters lead-based paint sampling and survey results into the Environmental and Natural Resources Division (ENRD) Lead Survey Computer Database.
- (4) Ensures information is updated and available so users, engineers, shop personnel, custodial and others can identify potential lead-based paint containing areas.
 - (5) Takes or coordinates collection, submission, and testing of bulk, air and wipe samples for lead.
 - (6) Per request, coordinates and/or assists in surveys and inspects reported damage to lead-based paint.
- (7) Coordinates results of testing with Industrial Hygiene to ensure appropriate personal protective equipment, work practices, and access controls are being utilized.
- (8) Has the authority to regulate areas containing visible contamination, which may pose a potential health hazard to building occupants or maintenance personnel. Information regarding such areas is forwarded to the Industrial Hygiene Section for review, monitoring, and comments addressing the health hazard. Coordinates results of testing with Industrial Hygiene and ensures that proper warnings and access controls are issued to users and building occupants.
- (9) Provides summary copies of lead sampling results to building users and/or DPW divisions required to perform maintenance or construction in a facility to minimize unnecessary contamination.
 - (10) Reviews work requests to determine if work may involve the disturbance of any lead-based paint.
- (11) Acts as clearing house for all lead-based paint actions. Develops lead management or abatement based on the identification of lead-based paint and the conditions of such surfaces. Projects are developed in coordination with ENRD, Safety, and Industrial Hygiene. Abatement associated with other work or demolition should be developed by responsible division and/or activity and reviewed by the LBPMC.
- (12) Serves as a technical consultant, assisting Engineering Services Division (ESD) with the design and execution of contract lead-based paint abatement and control projects.
- (13) Provides lead awareness training to DPW employees and other post personnel such as Activity Environmental Coordinators.
 - (14) Maintains updated certification requirements to be qualified as a lead inspector/risk assessor.
- (15) Ensures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
 - b. Engineering Services Division (ESD):

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(1) Ensures adequate identification of lead-based paint prior to the start of any renovation or demolition project. Checks existing survey and testing records available from the LBPMC. Requests additional lead testing by designer or separate contract, if required.

- (2) Provides the LBPMC with the results of any of the above testing so that facility records may be maintained and database entries updated.
- (3) Provides the LBPMC with results and documentation of all lead abatement done through ESD contracts in order that lead data may be updated.
- (4) Forwards copies of lead abatement plans to the LBPMC, Post Safety, and Industrial Hygiene for review and approval.
 - (5) Ensures proper coordination has been made with facility/building occupant prior to start of any work.
 - (6) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
 - (7) Documents that Division employees are properly trained in lead matters.
 - c. Business Management Division:
 - (1) Generates work requests for self-help and troop projects.
- (2) Ensures that Self-Help projects are reviewed for possible disturbance of lead-based paint. After receiving a defined scope of work from Estimating, the work request is forwarded to the LBPMC, or a designated lead qualified person, for review. An Asbestos/Lead Based Paint Caution form, Appendix B, will be filled out by the LBPMC or designated lead qualified person, signed by the facility user, and filed in the project folder. The work request is then returned to the Estimator to determine the potential cost of the project, to include any lead abatement necessary. All lead-based paint subject to disturbance in such projects must be abated by lead trained and qualified personnel prior to turning the work over to the building occupants as a Self-Help project.
- (3) Ensures adequate funding is programmed for lead abatement projects. Coordinates requests with ENRD for submittal in the 1383 Reporting System.
 - (4) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
 - d. Environmental and Natural Resources Division (ENRD):
 - (1) Reviews all work orders requests for possible environmental impact, to include lead.
 - (2) Reviews and approves lead abatement plans for compliance with environmental regulations.
- (3) Reports instances of environmental lead contamination to proper State, Federal and TRADOC authorities and ensures necessary cleanup actions are taken.
 - (4) Documents that ENRD personnel are properly trained in lead awareness.
 - (5) Performs (or coordinates) sampling/inspections for lead-based paint.
 - e. Facilities Support Division (FSD):
- (1) Requests through Chief, ENRD, that the LBPMC check existing survey and testing records prior to any work that may disturb any lead-based paint. Requests additional testing if area scheduled for work is questionable.

- (2) Posts and secures lead contaminated areas.
- (3) FSD performs randomly selected Quality Assurance Evaluations of lead abatement work performed by the contractor. The contractor supervises and performs Quality Control inspections of any lead abatement work done by the contractor.
 - (4) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- (5) Ensures waste generated from lead abatement projects is handled and disposed in accordance with the Fort Eustis Hazardous Waste Management Standing Operating Procedures.

f. Housing Division:

- (1) Provides occupants with notice of possible lead-based paint areas in quarters, procedures to take to prevent accidental disturbance, proper cleaning procedures, and provides occupants with a copy of the EPA pamphlet, "Protect Your Family From Lead in Your Home" prior to their signing for quarters built before 1978.
- (2) If a family member is pregnant, already lead poisoned, or otherwise identified by medical authority as at an increased risk for lead poisoning, this will be considered when assigning quarters.
 - (3) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
 - (4) Manages maintenance contracts for Family Housing.
 - g. Fire and Emergency Services Division:
 - (1) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
 - (2) Documents that employees are properly trained in lead matters.

h. Fort Story DPW:

- (1) Requests through Chief ENRD, that the LBPMC check existing survey and testing records prior to any work that may disturb any lead-based paint. Request additional testing if area scheduled for work is questionable.
 - (2) Posts and secures lead contaminated areas.
 - (3) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- (4) Provides the LBPMC with results and documentation of lead abatement projects done by NPWC on Army facilities at Fort Story in order that lead data may be updated.

B2-2-2. POST SAFETY:

- a. Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- b. Reviews and approves lead abatement plans for compliance with OSHA regulations.
- c. Insures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
 - d. Upon request, provides guidance on implementing 29 CFR to all appropriate activities.
 - e. Conducts respirator fit testing for individuals participating in the installations respiratory protection program.

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B2-2-3. MEDDAC:

- a. Industrial Hygiene:
 - (1) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- (2) As needed, conducts personal and general air monitoring on work sites for lead, including in-house lead abatement projects. Monitoring shall be conducted in accordance with 29 CFR 1910.1025.
 - (3) Provides lead monitoring results to the LBPMC.
 - (4) Reviews and approves lead-based paint abatement plans.
 - b. Occupational Health:
 - (1) Performs necessary medical exams as required in the lead medical surveillance program.
- (2) Provides Pulmonary Function Testing to Government employees participating in a respiratory protection program.
 - (3) Maintains occupational medical records for Government employees.
 - c. Community Health:
 - (1) Informs the LBPMC of any lead contamination incident so that proper response action may be taken.
- (2) Performs health risk assessments for military medical care beneficiaries where venous blood lead levels are equal to or greater than 10 ug/dl.
- (3) Ensures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
- (4) Provides the LBPMC with the results of all lead testing that show elevated blood lead levels on family members occupying government quarters.

B2-2-4. Northern Region Contracting Center (NRCC):

- a. Awards and administers contracts for lead removal and/or those requirements which contain some lead-based paint removal provisions. Further, will provide a final review of contract specifications to assure lead removal is included when appropriate.
- b. When informed of a lead contamination incident by a vendor or inspector, assures the LBPMC is notified so proper action may be taken to correct the situation.

B2-2-5. Directorate of Personnel and Community Activities (DPCA):

- a. Child Development Services:
- (1) Insures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
- (2) Notifies ENRD (LBPMC) and MEDDAC (Preventive Medicine) upon identification of potential or known lead-based paint hazards in Family Child Care units.

b. Youth Services:

- (1) Insures that any unresolved lead management issues are brought before the US Army Transportation Center Environmental Command Council.
- (2) Notifies ENRD (LBPMC) and MEDDAC (Preventive Medicine) upon identification of potential or known lead-based paint hazards.
- **B2-3-1.** Environmental Sources: Lead-based paint that deteriorates and becomes detached from its supported structure creates a serious environmental hazard that can affect the health of the Fort Eustis/Story community. Fort Eustis and Fort Story have many buildings containing lead-based paint. Environmental exposures from lead-based paint may occur as a result of any of the following circumstances:
- a. Deterioration of lead-based paint on abandoned/condemned and operational buildings (both interior and exterior). Lead-based paint eventually begins to deteriorate. This is enhanced by weathering, humidity, etc. Lead-based paint chalks, creating chips and fine particles.
- b. Renovation of existing buildings that contain lead-based paint. Dust hazards and soil contamination occur from scraping, sanding, grinding and other means of removing lead-based paint.
- c. Demolition of buildings containing lead-based paint. This creates lead-containing dust and contamination of the surrounding soil.
- d. Improper lead-based paint abatement. Fort Eustis/Story personnel or contractors performing duties of lead abatement can create hazards by not using proper procedures.
- e. Improper disposal of lead-based paint waste. Materials containing lead-based paint must be tested using the Toxic Characteristic Leaching Procedure (TCLP) before disposal. Disposal must be in accordance with the Resource Conservation and Recovery Act (RCRA).
- f. Exposure can also occur by accidental ingestion of soil particles via hand to mouth activity. Furthermore, consumable garden vegetables can take up lead in contaminated soil. Occupational exposures can cause environmental exposure when employees bring home lead-contaminated dust or soil on their shoes or clothing.
- **B2-3-2.** Controls: Possible lead exposure from the above circumstances can be controlled through lead-based paint identification and proper project design and execution.
- **B2-4-1. Occupational Exposure:** The lead standard was developed through animal toxicity studies to protect the health of individuals in the workplace. Employees may, on occasion, work in the presence of lead compounds, usually in the inorganic form. The permissible exposure limit (PEL) is fifty micrograms per cubic meter of air (50 ug/m³) averaged over an 8-hour period, at which nearly all workers may be exposed without any adverse health effects. The standard is intended to protect individuals from immediate and long-term toxic effects of lead. In the workplace, lead is mainly absorbed into the body through inhalation, although ingestion can be another route of exposure. Lead gets airborne through various means. In the form of dusts, fumes or mist, the lead can be inhaled, enter the respiratory tract and on into the lungs. Once the inhaled particles enter the bloodstream in the gas exchange region of the lungs (alveoli), they are circulated throughout the body and stored in various target organs. Lead entering the body through swallowing will have the same effect on the body. Some lead may be excreted, but not all will. This stored lead has the potential for irreversible damage.

B2-4-2. Prevention:

a. Working lifetime - maintain blood lead levels below forty micrograms per 100 grams of whole blood (40 ug/100g).

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b. Workers with potential for exposure (i.e. welders, lead abatement workers, deck personnel grinding on decks, etc.) should be included in the post medical surveillance program.

- c. Utilizing personal protective measures in the workplace:
 - (1) Personal Protective Equipment (PPE) such as respirators and protective coveralls.
- (2) Personal hygiene measures such as washing hands prior to eating, not eating in work areas, and showering before going home.
 - (3) Substitution of other paints for lead-based paint.

B2-4-3. References:

- a. Chemical Hazards of the Workplace 3rd Edition
- b. 29 CFR 1910.1025 Lead Standard 1994

B2-5-1. Prevention of Childhood Lead Exposure:

- a. A policy of either universal childhood blood lead screening or targeting only high risk groups will determined by the Installation Medical Authority.
- b. The Pediatric Clinic at McDonald Army Community Hospital routinely tests blood lead levels of children at 12 months of age or when otherwise indicated.
- c. Preventive Medicine maintains data on elevated blood lead levels in the community to identify trends and demographic characteristics.
 - d. Lead-based paint management is an integral part of the prevention of new cases.

B2-5-2. Referral:

- a. The Pediatric Clinic will notify the Community Health Nurse (CHN) section when an infant or child's venous blood lead level is greater than or equal to 10 ug/dl.
- b. The CHN section will initiate contact with the family to conduct an epidemiological investigation, provide education, and emphasize the importance of compliance with medical recommendations. A home visit will be made, if indicated, to on-post quarters. The CHN will report elevated blood lead levels occurring in off-post quarters to the local public health department.
- c. The CHN section will ensure, in coordination with the Chief, Preventive Medicine Services, that individuals or agencies responsible for the family's housing are notified and are aware of the health issues related to elevated blood lead levels.
- **B2-5-3.** Education: Increase public awareness through articles in the Wheel and by dissemination of educational materials in the Child Development Centers, hospital clinics, emergency room, post housing, and health fairs.
- **B2-5-4. Health Risk Assessment:** Once an elevated blood lead level has been found, a nutritional and environmental evaluation will follow.

B2-5-5. Blood Lead Screening:

a. The CHN section monitors all finger-stick results and when levels are greater than or equal to 10 ug/dl, ensures that a venous blood lead level is drawn.

- b. If the venous blood lead level draw is greater than or equal to 10 ug/dl, the CHN is notified; patients with elevated blood lead levels will be followed by a health care provider; to include sequential testing and treatment if indicated. The CHN will maintain a history of blood lead test results on a database, maintained indefinitely.
- **B2-6-1.** Lead-Based Paint Management Procedures: Management of lead-based paint can range from interim controls such as covering the paint to complete removal. There are two different strategies for the abatement of lead-based paint: removal and in-place management. In-place management is defined as those processes which make lead-based paint inaccessible by covering or sealing painted surfaces.

B2-6-2. The Removal Strategies:

- a. <u>Replacement</u> is defined as the removal of components that have lead-painted surfaces and installing new components free of lead-containing paint. Replacement should be considered for components that can be easily removed such as wood trim, windows, doors, etc.
- b. <u>Removal</u> is defined as the removal of lead-based material/paint down to the bare substrate by using either heat, chemical and/or mechanical methods. All on-site paint removal methods may produce large amounts of lead dust and lead residue. They are more hazardous than other methods and should be used with care. All on-site paint removal methods must be done by trained and licensed personnel.

B2-6-3. The Covering Strategies:

- a. <u>Enclosures</u>: Enclosures (sometimes referred to as rigid encapsulants) include but are not limited to paneling, gypsum board, plywood, tile board, and aluminum and vinyl siding. All enclosure materials should be applied with fasteners and adhesives and installed following the manufacturer's directions.
- b. <u>Encapsulants</u>: Encapsulation should be considered for surfaces difficult to remove (e.g., baseboards behind pipes). These surfaces are frequently found in kitchens and bathrooms where plumbing and fixtures make access to surfaces difficult. Encapsulants are not suitable for surfaces subject to any kind of abrasion, such as floors, window jambs or sashes, or doorjambs or edges. Because of the brittle nature of many encapsulants, they may tend to chip and flake with substrate deterioration. Suitable surfaces, depending upon toxicity, are: interior walls and ceilings, woodwork and wood trim, exterior masonry and wooden surfaces, and metal pipes.

B2-6-4. Army's Policy for Managing Lead-Based Paint:

- a. The Army's policy for controlling lead-based paint encourages in-place management as opposed to removal. In-place management procedures are used in preventing low risk conditions from deteriorating to create high risk conditions in the future. Lead-based paint should only be removed when in-place management is not effective; when removal is more cost effective than in-place management; or during whole-house revitalization or major renovation projects.
- b. In-place management requires periodic monitoring of surfaces known or suspected to be painted with lead-based paint. If it is suspected that lead levels in dust may be increasing, periodic clean ups should be done to keep lead from accumulating to dangerous levels on accessible surfaces such as windowsills, window wells and floors.
- c. In-place management also requires that precautions be taken to avoid inadvertently disturbing lead-based paint or otherwise creating lead-contaminated dust hazards in the course of other maintenance, repair, or revitalization work. Any work disturbing lead-based paint has the potential for generating lead dust. The level of risk is a function of the scale of work and the amount of dust generated, however, it does not take much lead dust to poison a child or adult. At a minimum, in-place management requires a rigorous clean up at the conclusion of any repair project which disturbs lead-based paint.

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d. All procedures which require the removal of lead-based paint must be performed by a certified deleading contractor. It is essential that personnel directly involved with reducing lead-based paint hazards are provided appropriate training to make them aware of the hazards of lead, proper procedures and work practices, and the need for protective equipment and proper hygiene.

e. Protection of Residents:

- (1) Housing residents or facility occupants shall not be permitted in the unit or in the vicinity of the job while abatement procedures are being carried out. Residents' belongings shall be protected from possible exposure to lead dust released during the project. Cleanup of all dust and debris will be required at the end of each workday. Complete cleanup, final inspections and clearance testing shall be required prior to reoccupancy.
- (2) In some cases, it may be possible to conduct preventive maintenance and repair projects while occupants remain in their homes or work areas. Care should be exercised to keep occupants and all children away from the work area and to protect their belongings from possible lead dust contamination.
- (3) Occupant Education: ENRD has created an informational pamphlet addressing lead-based paint is sues and has distributed it throughout the installation community. The pamphlet provides information on protecting children from lead poisoning, the importance of wet mopping with tri-sodium phosphate detergents to control lead dust accumulation, and points of contact for the identification and handling of lead-based paint or available health screening programs.
- **B2-7-1. Inspections and Sampling:** The Lead-Based Paint Management Coordinator (LBPMC) coordinates/conducts lead inspections of government buildings for the presence of lead-based paint to prevent release into the environment. Additionally, the LBPMC coordinates/conducts sampling operations for media suspected of containing lead-based paint. This may include sampling soil, paints, water, air and refuse/wastes. All inspections and sampling are performed IAW established HUD guidelines and EPA protocols.
- **B2-8-1. Personal Protective Equipment:** Exposure to lead from lead-based paint can often occur in the occupational setting. It is particularly important that employees utilize the proper personal protection equipment (PPE) when performing tasks that may involve exposure. This includes removing old paint from buildings and other structures (such as sanding, grinding and chipping), lead-based paint abatement work, lead-based paint inspection and general construction/demolition operations. To avoid exposure, employees must comply with appropriate laws, Army regulations and installation policies.

B2-8-2. Respiratory Protection:

a. General: Dust generated from deterioration, destruction or removal of lead-based paint represents an important health hazard. Employees may become exposed to lead dust by inhalation. Subsequently, the use of approved respirators as directed by the USATCFE Respiratory Protection Program is required.

b. Policy:

- (1) Appropriate respirators are used when lead dust is present at the work site. Generally, an air-purifying respirator with appropriate filter cartridges is used. However, supervisors must consider all factors associated with the work site to preclude other hazards. Other chemical hazards or oxygen-deficient environments may exist that require air-line or self-contained breathing apparatus (SCBA) respirators.
 - (2) Only National Institute for Occupational Safety and Health (NIOSH)-approved respirators are used.
- (3) Personnel will not perform tasks that require use of a respirator unless such personnel have had medical clearance, respirator training, fit testing and proper respirators have been provided.

B2-9-3. Personal Protection Equipment (PPE):

- a. General: The type of work environment that may contain lead-based paint hazards is variable. Proper safe work attire must be worn based on the work site conditions. Regardless of the work site conditions, employees should take all precautions against contaminating street clothes and foot wear with dust and debris suspected or known to contain lead. If such contamination occurs, it is likely that lead will be carried to other work sites or the home where other people can be exposed.
 - b. Personal Protective Clothing and Equipment.
- (1) In addition to wearing approved respirators, employees with potential for exposure to lead-based paint hazards should also wear protective clothing. For normal lead inspection or abatement work, disposable protective outer garments should be used. In addition, other work site factors should be considered. Eye protection such as goggles is necessary to avoid dust contact with the eyes. Proper foot wear and disposable gloves are also required. Other items such as hard hats are recommended.
- (2) Supervisors must still consider all characteristics of the work site to ensure that employees are protected against other hazards besides lead.

ASBESTOS AND LEAD-BASED PAINT CAUTION FORM

PROJECT NUMBER:
FACILITY:
WORK DESCRIPTION:
DPW has completed a survey in accordance with Army Regulation 200-1, which requires that all Army structures be surveyed to determine the location, quantity and condition of any asbestos containing materials (ACM). A similar survey will be conducted to evaluate the extent of lead-based paint (LBP) in selected facilities. This information will be provided to building occupants to prevent the accidental disturbance of these materials. It is understood that some areas may require additional sampling to fully identify all potential problems.
The following materials have been identified in your facility:
I, the undersigned, hereby verify that I have been informed of the presence or possible presence of asbestos containing material and/or lead-based paint in this facility.
Prior to working in the facility of known or assumed asbestos containing material and/or lead-based paint, I shall notify DPW, obtain approval and follow procedures designed to protect myself, other building occupants, and the environment.
I fully understand that the materials mentioned above must not be disturbed, removed, or altered in any fashion. Work which requires the disturbance of ACM or LBP must be accomplished by properly trained and licensed personnel. Coordinate with DPW to ensure the material is handled and disposed of in accordance with all appropriate Federal/State laws and regulations.
Name of Requestor
(please print)
Signature
Organization
Telephone number

TCFE FORM 6031-ENRD-DPW (17 Jan 96)

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Appendix C

Training Requirements

C-1. Purpose. This Appendix specifies, consolidates, and outlines the minimum training requirements for personnel performing duties that involve the management of Hazardous Materials (HMs), Hazardous Wastes (HWs), Universal Waste (UWs), Solid Wastes (SWs), and Recyclable Materials (RMs), Asbestos Containing Materials (ACMs) and Lead Based Paint Training are discussed in B1-3-4 and B2-2-1 respectively.

C-2. General.

- a. Federal, State, and Army Regulations require that personnel who perform functions involving HMs, HWs, UWs, and ACM must be trained.
- b. Commanders, Directors, and other in-line managers can be held civilly or criminally accountable for not properly training or supervising their personnel under the "responsible corporate officers doctrine."

C-3. Key applicable regulations.

- a. 29 CFR 1910.120
- b. 29 CFR 1910.1200
- c. 49 CFR 172.704
- d. 40 CFR 262
- e. DOD 4500.9R Defense Transportation Regulation
- **C-4. Personnel.** Key personnel positions listed below are identified by job titles and general duty descriptions:
 - a. Job Title: Chief, Prevention Branch

Duty Description: DPW-ENRD Branch Chief responsible for all aspects of environmental management related to the prevention of pollution which includes but is not limited to hazardous materials, solid waste and hazardous waste, asbestos and lead paint, PCBs, spill prevention, affirmative procurement, and environmental management systems.

b. Job Title: HWM Policy Manager:

Duty Description: DPW-ENRD action officer responsible for Resource Conservation & Recovery Act (RCRA) Hazardous Waste Management (HWM) and Universal Waste Management (UWM) compliance. Responsible for ensuring that Fort Eustis and Fort Story comply with all applicable Federal, State, and local laws and Department of Army regulations and policies pertaining to the identification, storage, transportation, and disposal of hazardous wastes. Review, update, and coordinate local HWM and UWM regulations, plans, and materials. Develop, update, and conduct HWM and UWM training. Provide technical and compliance guidance concerning HWM and UWM requirements to Commanders, Directors, and subordinate personnel to include unit/activities inspections and technical assistance visits.

c. Job Title: Hazardous Waste Accumulation Facility (HWAF) Operations Officer:

Duty Description: DPW-ENRD action officer responsible for HWAF operations, including Contract Officer's Representative (COR) for HWAF and Used Oil contracts. Responsible for ensuring HWAF compliance with all applicable Federal, State, and local laws and Department of Army regulations and policies pertaining to the

identification, storage, transportation, and disposal of HWs, UWs, and NHWs.

d. Job Title: Activity Environmental Coordinator (AEC):

Duty Description: The AEC is the single point of contact for all activity environmental matters. Ensures environmental compliance with all Federal, State, and local rules and regulations. Ensures compliance with all DOD, DA, and Fort Eustis and Fort Story regulations and policies. Provides management oversight and assistance to activity Hazardous Waste Coordinators (HWC), and Recycling Coordinators (RCs). Commander's or Director's representative for conducting internal Environmental Management inspections. May act on behalf of an activity's HWC. Signs Container Contents Log (CCL) certification. Is by definition, the Recycling Coordinator.

e. Job Title: Hazardous Waste Coordinator (HWC):

Duty Description: HWC manages Hazardous Waste (HW) accumulation sites: Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs). Ensures compliance with all Federal, State, and local rules and regulations. Ensures compliance with all DOD, DA, and Fort Eustis and Fort Story regulations and policies. Assumes accountability for proper identification, classification, packaging, labeling, marking, storage, record keeping, transportation, and reporting requirements. Trains activity's Hazardous Waste Supervisors (HWSs), Hazardous Waste Handlers (HWHs), Universal Waste Handlers (UWHs), Recycling Coordinators (RCs) and Hazardous Materials Handlers (HMHs). Provides management oversight and assistance to activity HWSs and/or HWHs. Is the Recycling Coordinator at this level.

f. Job Title: Hazardous Waste Supervisor (HWS):

Duty Description: First line supervisor of HWHs. May assist and act on behalf of the HWC when the HWC is absent for short periods of time. These duties may include but are not limited to in the proper identification, classification, packaging, labeling, marking, storage, record-keeping, transportation on-post and reporting requirements, moving, transferring, inspecting, of HW.

g. Job Title: Hazardous Waste Handlers (HWH):

Duty Description: All those individuals having assigned duties that involve handling HWs. These duties may include but are not limited to HW generation, and assisting the AEC, HWC, or HWS in the proper identification, classification, packaging, labeling, marking, storage, record-keeping, transportation on-post and reporting requirements, moving, transferring, inspecting.

h. Job Title: Universal Waste Handler (UWH):

Duty Description: All those individuals having duties that involve handling or managing UWs. These duties may include but are not limited to UW generation and in the proper identification, packaging, labeling, marking, storage, record-keeping, transportation on-post and reporting requirements, moving, transferring and inspecting. These duties will be performed by AECs, HWCs, or HWSs for activities not having these positions.

i. Job Title: Recycling Coordinator (RC):

Duty Description: The RC is the Activity's point of contact for recycling. The RC will establish and/or maintain the activity's recycling program. The RC will ensure that recyclable materials are not being discarded into the dumpsters designated for trash or other improper disposal.

j. Job Title: Hazardous Materials Handler (HMH):

Duty Description: All individuals having duties that involve handling or managing HMs.

C-5. Types of training.

- a. Occupational Health and Safety Administration (OSHA):
 - (1) OSHA Training Required:
- (a) "HazCom" training IAW 29 CFR 1910.1200. This training is required for AECs, HWCs, HWSs, HWHs, UWHs, RCs and HMHs.
- (b) HazWOPER: "First Responder Awareness Level" training IAW 29 CFR 1910.120. This training requires annual up dates. This training is required for AECs, HWCs, HWSs, HWHs, UWHs and HMHs.
- (c) Personnel requiring Basic (BEM), Intermediate (IEM), and Advanced (AEM) Environmental Management training must receive "HazCom" and "First Responder Awareness Level" training prior to receiving EM training.
- (2) HazWOPER: 24 or 40 hours Site Operations Training IAW 29 CFR 1910.120 may be substituted for First Responder training. This training may substitute for HazCom training if it meets 29 CFR 1910.1200 requirements.
 - (3) The Post Safety Office is the proponent for OSHA training. The Post Safety Office provides HazCom.
- (4) Initial and annual refresher First Responder Awareness Level training requirements can be met by using the "Emergency First Responder, USA Awareness and Operations Level", 710869 program available from the TASC Film Booking Office. Post Safety Office's First Responder videotape may be used for annual refresher training.
- b. Basic Environmental Management (BEM) training. This training is required for AECs, HWCs, HWSs, HWHs, RCs and UWHs. BEM requires annual refresher training and the Program of Instruction (POI) for Initial and Annual Refresher in paragraph 7 will be used.
- c. Intermediate Environmental Management (IEM) training. This training is required for AECs, HWCs, and HWSs. IEM requires annual refresher training and the POI for Initial and Annual Refresher in paragraph 8 will be used.
 - d. Advanced Environmental Management (AEM) Training: This training is required for AECs and HWCs.
- (1) AEM training includes initial and annual refresher training. Personnel must receive refresher training by the last day of the month in which they were trained, e.g., received training on 10 March of the previous year must receive refresher training by 31 March of the current year).
- (2) AEM training will be conducted by DPW-ENRD on a semi-annual basis. Training will be held usually during the months of March and September. An approved contractor may be used when personnel cannot attend a scheduled class conducted by DPW-ENRD and the attendees must pay for this class. The number of training sessions is based on projected requirements. Activities should plan accordingly. Priority will be given to AECs and HWCs. HWSs and HWHs will not be admitted. The POI for AEM training for AECs and HWCs is listed in paragraphs 9 and 10.
- (3) AECs or HWCs will provide Basic Environmental Management (BEM) training to HWSs, HWHs, HMHs, UWH, and RCs; and provide Intermediate Environmental Management (IEM) training to HWSs.
- (4) All HWSs and HWHs must be trained within 6 months of being assigned HW duties. HWSs and HWHs must work under the direct supervision of an AEC, HWC, or a trained HWS until properly trained.
- e. Department of Transportation (DOT) "HazMat Employee" training IAW 49 CFR 172.704: This training must be obtained at activity expense from non-installation sources. (If the FE/FS HWAF is used, this additional training is

not necessary.)

- (1) AECs and HWCs for Activities which do not secure containers or do not ship HWs, UWs, and NHWs through the HWAF facility must receive at least an 8 hour "HazMat Employee" training IAW 49 CFR 172.704. (If the FE/FS HWAF is used, this additional training is not necessary.)
- (2) Personnel authorized to sign HW manifests manifests must complete the Hazardous Waste Management and Manifesting course with respective refresher course every 24 months IAW DOD Instruction 4500.9-R Chapter 204 paragraphs D.1.d. (http://www/hnd.usace.army.mil).
- (3) Personnel shipping Hazardous Materials must complete the Defense Packaging of Hazardous Materials for Transportation course with respective refresher course every 24 months IAW DOD Instruction 4500.9-R Chapter 204 paragraphs D.1.b. (http://smpt.apg.army.mil).
- (4) Personnel shipping Regulated Medical Waste must complete the Transport of Biomedical Material course with respective refresher course every 24 months IAW DOD Instruction 4500.9-R Chapter 204 paragraphs D.1.e. (http://chppm-www.apgea.army.mil/trng/datepage.htm#Force).
- f. General Environmental Management Awareness Training. ENRD provides Environmental Awareness Training to activities upon request or as needed. Topics may vary depending on the needs of a given activity and may include solid waste management, recycling, spill prevention, environmental laws and regulations, environmental safety, hazardous materials management, pollution prevention, asbestos awareness, lead awareness, understanding material safety data sheets, NEPA compliance and combinations thereof. Such training could be available for Officer Professional Development, NCO Professional Development, Sergeants Time or through other unit training programs. The Environmental Management Handbook (EM HB) provides a general overview the Fort Eustis and Fort Story environmental program and is required reading for all Officers, NCOs and appropriate civilian managers and supervisors.
 - g. Pollution Prevention (P2) training will be conducted or sponsored by DPW-ENRD on an as needed basis.
- h. Hazardous Materials Spill Prevention Training. AECs, HWCs, and activities that store, maintain and operate petroleum/fuel facilities must have hazardous material spill prevention training. Training is conducted via two mechanisms.
- (1) Hazardous Material Spill Prevention Training is conducted annually by ENRD for Activity Environmental Coordinators and Hazardous Waste Coordinators during AEM training (initial and refresher training).
- (2) Hazardous Material Spill Prevention Training is conducted by ENRD for activities maintaining or utilizing bulk petroleum storage facilities (including activities operating military watercraft and fuel transport vehicles) at least annually. This includes the 7th Transportation Group, ECS 93, DPW and DPTMSEC (Felker Army Airfield fuel farm). Additional tenant activities/operations may be added when mission changes, reorganizations, or infrastructure changes occur (or assignment of new organizations to Fort Eustis or Fort Story) that may add new bulk petroleum storage facilities or potentially increase the risk of discharges.
 - (3) ENRD provides Hazardous Material Spill Prevention Training to other activities upon request.
- i. Compliance with the National Environmental Policy Act (NEPA) and AR 200-2 Training. Activities need to be familiar with the federal requirements to assess the environmental impacts associated with actions and projects. ENRD provides training to activities based on Appendix E as needed.
- C-6. Scheduling and administration of the advanced environmental management (AEM) training:
 - a. Personnel being appointed as AECs or HWCs requiring AEM training:
 - (1) Must submit a correctly completed and signed TCFE Form 643, "AEC and HWC Appointment and

Training Record" (Figure C-1) to DPW-ENRD by the required suspense date listed on the training announcement or personnel will not be allowed to attend. AEM training announcements will be disseminated by Email approximately

30 days prior to class date. The TCFE Form 643 is used to reserve classroom space and certify the training. All prerequisites must be completed and recorded on the form at time of submission and certified by the Commander or Director.

- (2) AECs are required to have an Email address and must complete Block 14.b on TCFE Form 643.
- (3) Must complete "HazCom" training prior to attending the AEM course. Date trained entered in Block 15 on TCFE Form 643.
- (4) Must complete "First Responder Awareness Level" training prior attending the AEM course. Date trained entered in Block 16 on TCFE Form 643. Requires annual refresher updates.
- (5) Must complete the "Basic Environmental Management (BEM)" training prior to attending the AEM course. Must score at least 70% on the BEM Test. Date trained and test score entered in Block 17 on TCFE Form 643. Requires annual refresher updates.
- (6) Must complete "Intermediate Environmental Management (IEM)" training prior to attending the AEM course. Must score at least 70% on the IEM Test. Date trained and test score entered in Block 18 on TCFE Form 643. Requires annual refresher updates.
- (7) Commanders or directors that do not currently have either an AEC or HWC will certify personnel being appointed as AECs or HWCs have thoroughly reviewed the Environmental Management Handbook (EM HB); BEM and IEM standardized training slides; and attained a score of at least 70% on the BEM and IEM tests and record this information in Blocks 17 and 18 on TCFE Form 643.
- (8) Activities are responsible for grading the BEM and IEM tests and attaching the original answer sheet to the submitted TCFE Form 643. No copies of test questions will be accepted. Activities are responsible for providing each scheduled AEC and HWC a copy of this regulation prior to the scheduled class. No copies will be provided on the day of training.
- (9) AECs and HWCs must be appointed and trained before they can assume any HWM duties. AECs and HWCs must make a minimum score of 70% on the AEM test. AECs and HWCs that let their training lapse must be immediately removed from HWM duties.
 - b. Interim training of AECs or HWCs may be accomplished by an Activity's AEC.
- (1) This AEM training is only good until the next scheduled AEM training by DPW-ENRD, e.g. March or September.
 - (2) AECs and HWCs must meet and complete all requirements in paragraph 5.a above.
- (3) Once these requirements are met, the AEC providing the training will obtain an AEM test from DPW-ENRD and administer the test to the interim AEC or HWC.
- (4) The completed TCFE 643 and answer sheet will be turned in to DPW-ENRD for grading and approval. A score of 70% must be achieved.
 - c. All BEM, IEM, and AEM training records must be kept for at least 3 years.
 - (1) The job titles and duty descriptions in paragraph 3 above will be used and modified as required.
 - (2) TCFE Form 642 "EM Training Record" (Figure C-2) will be used as the roster to record and document job

titles as they apply to EM, classroom attendance and training. A separate TCFE Form 642 will be completed for each type of training.

- (3) The completed answer sheets TCFE Form 6270 (Figure C-3) will also be maintained with the TCFE Form 642 "EM Training Record.
- (4) These records will be made available for inspections by regulators such as VDEQ and EPA copies will be retained x years.
- **C-7. POI for the Basic Environmental Management (BEM) Initial and Refresher Courses:** This course covers approximately 3 hours of the basics of environmental compliance, OSHA, RCRA, DOT with an emphasis on Pollution Prevention; hazardous materials and chemical safety; spills and emergency response; solid and hazardous waste management; universal waste management; and final test.
- a. The standard set of training slides will be used. Activity or site specific slides may be added. These slides are currently available from DPW-ENRD on disk or by Email in MS Windows Power Point format.
- b. Initial training will include the showing of the following, available from TASC: "HazMart Procedures & Operational Video (A0511-98-0001).
- c. Each student will be provided a copy of the EM HB to be used as a classroom handout and as a take home reference guide. Students must receive a 70% or better on the BEM Test.
 - d. Students must receive a 70% or better on the BEM Test, which is included with the BEM training program.
- C-8. POI for the Intermediate Environmental Management (IEM) Initial and Refresher Courses: This course covers approximately 2 hours giving the attendee sufficient training to supervise HW operations at this level and to act as an interim AEC or HWC. The basics of regulations and legal aspects of environmental compliance; AEC and HWC duties; HWM, i.e. training requirements, waste identification, accumulation; transportation, emergency response procedures; pollution prevention and waste minimization; solid waste management and recycling are covered and final exam is given.
- a. The standard set of training slides will be used. Activity or site specific slides may be added. These slides are currently available from DPW-ENRD on disk or by Email in MS Windows Power Point format.
- b. Each student will be provided a copy of the EM HB to be used as a classroom handout and as a take home reference guide. Students must receive a 70% or better on the IEM Test.
 - c. Students must receive a 70% or better on the IEM Test, which is included with the IEM training program.
- **C-9. POI for the initial Advanced Environmental Management (AEM) training course:** Initial training is a one day course covering regulations and legal aspects of environmental compliance; AEC and HWC duties and responsibilities; HWM, i.e. training requirements, waste identification, accumulation; transportation, emergency response procedures; pollution prevention and waste minimization; EPCRA; solid waste management and recycling; and final exam.
- C-10. POI for the annual refresher Advanced Environmental Management (AEM) training course: Annual Refresher training is a one half day review course covering regulations and legal aspects of environmental compliance; Update on new and pending changes; AEC and HWC duties and responsibilities; HWM, i.e. training requirements, waste identification, accumulation, transportation, and emergency response procedures; pollution prevention and waste minimization; EPCRA; solid waste management and recycling; and final exam.

Appendix C Figure C-1 Page 1

AEC and HWC APPOINTMENT and TRAINING RECORD

Instruc	tions for completing thi	s form are on	the reverse side		
	1. Reque	sted Training D	Date:		
Type of Appointment - Check One		Type	of Training - Ch	eck One	
Activity Environmental Hazardous Waste Coon			4. Initial 5. Annua	Training I Refresher Tra	ining
6. Primary Coordinator		7. Alternat	e Coordinator		
8. Appointee's Name;					
ů.	LAST NAME		FIRST NAM	ATE.	MI
Phone Number Rank or Grade requirements: AEC - V	. Rank or Grade* WO1, GS11, or higher; 11	WC - E-5, GS5	l I. Job Title 5, or higher		1
12a. Group, Bdc, etc.:	12b. Battalion		12c	. Company _	
13a. Directorate:		13b. Divisi	ion		
14a. Office Bldg No:	L4b. **Busines (** Required for AEC				
Environmental Management Training					
 Hazard Communication IAW 29 C First Responder-Awareness Level Basic Environmental Management Intermediate Environmental Mana 	IAW 29 CFR 1910.120 Training:	Score:	Date Date	e Trained: e Trained: e Trained: e Trained:	
I certify that the prerequisites listed complete and accurate. I designate specified for training. I understand certification under RCRA, UCMJ, a	that the place of duty for that I am subject to pote nd Virginia law.	r the above na ential civil or c	med individual i	is in the classro ment for false	oom
21. Date	22.	. Typed or Prin	nted Name and G	irade	
	23	. Typed or Pri	nted Title (Comn	nander or Direc	tor)
24. Email of Commander or Dir			1-24 22 22		
Coordinators must receive training a successfully completing the training		ent is valid for	one year from	the date of	
DO NOT WRITE IN THIS BLOCK - FOR E	NRD USE ONLY			12 073	
DATE OF TRAINING	TEST SO	ORE(>70%)		APPRO	OVED PROVED
Signature of ENRD Person	nel			DisAr	TNOYED

TCFE Form 643

Mar 03 (Previous Edition is Obsolete)

Appendix C Figure C-1 Page 2

INSTRUCTIONS

ALL ENTRIES MUST BE TYPED OR CLEARLY PRINTED. FORMS MISSING INFORMATION WILL NOT BE ACCEPTED FORMS MUST BE SUBMITTED TO DPW-ENRD, PRIOR TO THE SUSPENSE LISTED ON THE TRAINING ANNOUNCEMENT (MEMO OR EMAIL)

SCHEDULING OF ADVANCED ENVIRONMENTAL MANAGEMENT TRAINING MUST BE MADE THROUGH THE AFC

- ITEM 1: Enter the appropriate training date for either Initial or Annual Refresher. Classes are usually scheduled during the months of March and September.
- ITEM 2: Check this block if being appointed as an Activity Environmental Coordinator (AEC).
- ITEM 3: Check this block if being appointed as a Hazardous Waste Coordinator (HWC).
- ITEM 4: Check this block for Initial Advanced Environmental Management Training (AEM).
- ITEM 5: Check this block for Annual Refresher AEM Training.
- ITEM 6: Check this block if being appointed as the activity's Primary Coordinator.
- ITEM 7: Check this block if being appointed as an Alternate Coordinator.
- ITEM 8: Enter name of Appointee.
- ITEM 9: Enter telephone number of Appointee.
- ITEM 10: Enter rank or grade of Appointee Grade Restrictions Apply.
- ITEM 11: Enter the actual job title of Appointee.
- ITEMS 12a, 12b, and 12c: Enter the Appointee's military organization or;
- ITEMS 13a and 13b: Enter the Appointee's civilian organization.
- ITEM 14a: Enter the Appointee's Office Building Number.
- ITEM 14b: Enter the Appointee's Business Email Address (This is mandatory for AECs).

These Training Prerequisites MUST Be Completed Prior to Submitting Form for Reserving a Class Date.

- ITEM 15: Enter the date the Appointee received Hazardous Communication training.
- ITEM 16: Enter the date the Appointee received First Responder-Awareness Level. **This training must be updated annually.**
- ITEM 17: Enter the test score and date the Appointee completed Basic Environmental Management (BEM) training. **This training must be updated annually.**
- ITEM 18: Enter the test score and date the Appointee completed Intermediate Environmental Management (IEM) training. **This training must be updated annually.**
- ITEM 19: Enter telephone number of Commander or Director.
- ITEM 20: Signature of Commander or Director.
- ITEM 21: Enter Date appointed.
- ITEM 22: Typed or Printed name and rank or grade of Commander or Director.
- ITEM 23: Title of Commander or Director.
- ITEM 24: Email address Commander or Director.

ONCE THE COORDINATOR SUCCESSFULLY COMPLETES THE AEM TRAINING, A COPY OF THIS FORM WILL BE RETURNED TO THE ACTIVITY THROUGH THE AEC.

Appendix C Figure C-2

Student's Name	**Student's BEM Test IEM Te
*Initial Training (1) or Annual Refresher Training (R) ** Student's EM Job Title: HWS, HWH, UWH, HMH, ARC	, HMH, ARC
INSTRUCTOR'S NAME/SIGNATURE: DATE of T	DATE of TRAINING:
Chy man 3 31777	

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Appendix D

Environmental Planning, Impact Assessment & Documentation

D-1. Purpose. This appendix provides guidance for integrating environmental impact assessments into installation-wide planning and decision-making. It establishes policy and responsibilities for ensuring that required environmental impact assessment is performed and applicable documentation is prepared for proposed USATC projects and actions, and that final documented results are adhered to by project/action proponents. Except where specifically stated, the term "action" refers to any mission, operation, activity, event, exercise or project performed by a federal agency, military organization or on a installation, or which is supported by federal government or Department of Defense (DoD) resources.

D-2. Applicable Regulations.

- a. The National Environmental Policy Act (NEPA) establishes policies and goals for the protection of the environment. NEPA requires the systematic analysis of possible and probable environmental consequences of implementing a proposed action. Federal regulations implementing the provisions of NEPA are found at Title 40 of the Code of Federal Regulations Part 1500.1 1510.1.
 - b. Title 32 of the Code of Federal Regulations Part 651, Environmental Analysis of Army Actions.
 - c. Title 40 of the Code of Federal Regulations Part 1500-1510.
- d. Army Regulation (AR) 200-2, *Environmental Effects of Army Actions*, establishes policy, responsibilities and procedures for implementing the require ments of NEPA into Army planning and decision making.
- e. AR 200-1, *Environmental Effects of Army Actions*, implements Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requirements which include determining the environmental suitability for a proposed real property transaction.
 - f. Coastal Zone Management Act, 15 U.S.C. Subsection 1456 (c).
- g. Memorandum, Subject: TRADOC Policy for Environmental Requirements for Non-BRAC Real Property Transactions, ATBO-SE, 24 Jul 98.
- h. DA Pam 200-1, *Environmental Protection and Enhancement*, describes Department of the Army procedures and methodology in preserving, protecting and restoring environmental quality.
- **D-3. Applicability.** This Appendix applies to all DoD and US Army tenant activities and all non-DoD tenants whose actions take place on Fort Eustis or Fort Story. Actions include any short or long-term federal or military action or contribution of federal government or military resources to a non-federal or military project. Examples of actions or projects include (but are not limited to) training, exercises, construction, reorganization of military units, transfer of personnel or organizations to or from Fort Eustis and Fort Story, utilization of military real estate by non-military entities, demolition of property, acquisition of real estate, training or mobilization of US Army Reserve or National Guard units (not under national or state emergency conditions), US Army Corps of Engineer military or civil projects utilizing Fort Eustis or Fort Story resources, repair and maintenance of existing facilities or property, expansion of training areas, changes in land use, dredging operations, implementation of new missions, and testing or fielding of new systems or equipment.

D-4. Policy. It is USATC policy to:

- a. Avoid or minimize adverse environmental consequences while performing all mission and support activities.
- b. Ensure that the environmental consequences are considered in the planning and decision-making process for implementing any USATC action.

- c. Address actions in a timely manner to ensure the appropriate level of environmental impact assessment is completed and approved before commencement of such actions.
- d. Perform appropriate environmental impact assessment, prepare required environmental documentation and obtain approval of such documentation by authorized signature as described in this regulation prior to commencing with the proposed action. This includes obtaining any additional federal, state, regional, and local authorization before executing any action requiring such documentation, permits and authorization.
- **D-5.** Actions Not Requiring Environmental Impact Analysis. Any proposed action that has potential impact to the environment must be formally analyzed. Some actions, as listed below, are exempt and require no further evaluation. All other actions require formal analysis unless specifically exempted by either of the conditions described below (ENRD (telephone 878-4123, ext 293) will be contacted to determine whether the proposed action is one that can be exempted).
- a. Action Exempted By Law. The law applies to DoD and/or the US Army and prohibits, exempts or makes impossible full compliance with environmental documentation requirements of NEPA. The proponent and ENRD will consult with the USATC Staff Judge Advocate and applicable federal, state and local agencies to determine applicability of mission, action or project exemptions by law.
- b. Emergency Action. In the event of an emergency, immediate action may need to be taken that has environmental impacts, but which is necessary and cannot be delayed for national defense or security, or to protect life or property.
 - c. Renovation of Existing Building Interior. See Tab 1 for appropriate documentation.
- **D-6.** Classified Actions. Classification does not exempt the action/project from the necessity to assess and document the environmental effects of a proposed action. ENRD (telephone 878-4123, ext 293) will be contacted for guidance before initiating any environmental evaluation of a proposed action that is classified.
- **D-7. Required Records and Documents.** All actions will be analyzed to determine if long-term and short-term impact(s) to the environment will result. Such analysis will be accomplished using one of the following three methods as applicable.
 - a. Record of Environmental Consideration (REC).
- (1) The purpose of a REC is to document why no significant impact will result from an action. It describes the proposed action in detail, the anticipated timeframe, identifies the proponent, explains why no significant impact to various environmental resources will result during or after completion of an action and explains why further environmental analysis and documentation is not required. The REC is a signed statement that is submitted with all other project documentation.
- (2) A REC is prepared if the action adheres to a specific Categorical Exclusion (CX) from AR 200-2 or if an existing EA is sufficient to allow tiering a REC to such a document. ENRD determines if tiering is an appropriate option. RECs are also required for real property actions for which a CX is appropriate. An action cannot be segmented so as to generate rationale for a CX. Segmenting an action may preclude appropriate analysis of cumulative effects.
- (3) The required format and content for a REC is provided at Tab 1. Technical assistance for preparing the REC is available from the ENRD.
- (4) A modified REC for projects comprising interior renovation of existing buildings is provided at Tab 2. This type of REC is used only for preexisting buildings (used solely for housing of administrative operations) for which the interior portions are to be renovated or modified. This REC only applies to renovations/modifications of buildings needed to improve administrative operations or occupant comfort.
- (5) Proponents of actions will prepare RECs using the format at Tab 1 (The format at Tab 2 is used for projects solely involving interior building renovation). This includes preparing the "Description of the Action" paragraph and

those environmental resource areas with which the proponent is familiar regarding his/her project. Typically, these resource areas includes asbestos abatement and/or lead-based paint abatement in renovation and demolition projects, hazardous materials to be used in the project, wastes likely to be generated, expected noise generation, solid waste to be generated, erosion issues, and whether radiation sources will exist during the project. Proponents shall prepare these paragraphs at a minimum and forward draft RECs to ENRD. ENRD will review the document, research those areas the proponent cannot assess and provide feedback to the proponent. Once feedback is addressed by the proponent (making changes provided by ENRD, accomplishing additional coordination, providing additional information, performing a site visit with ENRD, etc) the proponent will sign the REC and forward to ENRD for approval. Proponent signatory authority should be individuals having supervisory or managerial authority for the action. Typically, this would be separate company commanders, battalion commanders, brigade or Group commander, division chiefs, and directors.

- (6) RECs should be submitted to ENRD at least 45 days prior to commencement of a project. Hardcopies may be submitted; however, it is recommended that RECs be submitted electronically. However, it is further recommended that proponents initiate coordination with ENRD earlier in the event that an EA or EIS may be deemed necessary.
 - b. Environmental Assessment (EA).
- (1) The EA is a document is prepared when no Categorical Exclusion from AR 200-2 is appropriate or if it is uncertain whether the action/project/operation/mission will have significant impact on environmental resources. Normally an EA is required when the action is not eligible for a Categorical Exclusion from AR 200-2 and therefore eliminating the option to prepare a REC.
- (2) An EA determines whether significant impact will occur from a project. Subsequently, an EA results in either a Finding of No Significant Impact (FONSI) if it is determined that no significant impact exists or the requirement to prepare a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS). Preparation of an NOI means that significant impact will occur and an EIS must therefore be prepared to obtain more detail about the impact(s) and identify ways to mitigate the impact(s).
 - (3) EAs are prepared in accordance with AR 200-2. This includes format, length and content.
- (4) All data will be collected, analysis completed and one final draft EA will be submitted for review by applicable installation staff. References to FONSIs or NOIs will be omitted until the document has been reviewed.
- (5) The Garrison Commander approves all EAs. Tenant activity proponents responsible for completion of EAs do not have approval authority for these documents.
 - (6) In general, an EA is required if the proposed action meets one or more of the following criteria:
 - (a) Potential for measurable degradation of the environment.
- (b) Potential for cumulative impact on the environment especially when combined with other actions or when the action is of lengthy duration.
 - (c) Presence of hazardous/toxic chemicals or harmful radiation which could be released into the environment.
- (d) Potential for violation of pollutant abatement standards, National Pollutant Discharge Elimination System/Virginia Pollutant Discharge Elimination System permits, or air quality permits.
 - (e) Potential for some harm to cultural/historical or ecologically sensitive areas.
 - (f) Requires a permit from a federal or state agency.
- (g) Potential for adverse effects on an endangered or threatened wildlife species (federal or state), species of concern, serious effects on amphibian populations or effects on critical wildlife habitat.
 - (h) Potential effects on endangered or threatened plants.

- (i) Project will alter, damage or encroach upon wetlands, vernal pools, sub-aqueors lands or primary sand dunes.
- (j) Violate provisions of existing Fort Eustis or Fort Story Integrated Natural Resources Management Plans (INRMP) or provisions of the Chesapeake Bay Preservation Act.
 - (k) It is uncertain whether the action will significantly impact the environment.
 - (1) The action does not qualify for a Categorical Exclusion from AR 200-2 or cannot be tiered to an existing EA.
 - (7) Examples of actions that typically require an EA (but not limited to) include the following:
 - (a) Special training exercises on federal land.
 - (b) Non-military field training.
- (c) Military construction on undisturbed land, or construction of a facility that houses other than administrative activities.
 - (d) Testing or using developmental or new weapon systems, equipment, items or vehicles.
 - (e) Repair or alteration projects affecting historically significant structures.
- (f) Activities affecting species on, or proposed for, the list of federally threatened and endangered plant and wildlife species or state listed threatened or endangered plant and wildlife species as well as state listed species of concern.
- (g) Activities that could cause destruction or damage to primary sand dunes, soil erosion or compaction, potential encroachment, damage or loss of wetlands, impact floodplains, wilderness areas, conservation areas, preservation areas, wildlife refuges, aquifers or other water supplies, or land or communities outside the installation boundary.
 - (h) Proposals that may lead to accessing of US Army real property.
- (8) Finding of No Significant Impact (FONSI). The FONSI is a concise document prepared when a completed EA (for a given action) determines that no significant impact exists and an EIS is not required. The FONSI:
- (a) Briefly presents reasons why an action will not have a significant effect on the environment, and thus, will not require an EIS.
- (b) Accompanies the EA and is made available to the affected or potentially affected or interested public for comment prior to commencement of the action. The comment period is normally a 30-day period. A notice is published in the local newspaper and copies of the FONSI and EA are submitted to local libraries. Additional means of notifying the public may be necessary. Comments from the public and regulatory agencies and local authorities must be addressed.
- (9) Proponents will coordinate with the ENRD for guidance on preparing the EA, and the format and content to be used.
 - (10) For planning purposes, an EA (and FONSI) typically takes 3-6 months to complete.
 - c. Environmental Impact Statement (EIS).
- (1) An EIS is a public document that provides a detailed, objective analysis of the environmental consequences of a proposed action. It is required for any major action which significantly affects the quality of the environment or which is environmentally controversial (i.e., substantive disagreement, real or purported, exists as to the extent, nature or effect of the action on the environment). An EIS is normally required when the proposed action has the potential to:

- (a) Significantly degrade environmental quality, public health or safety.
- (b) Significantly affect historic or cultural resources, ecologically important areas, conservation areas, preservation areas, wetlands, or other areas of unique environmental concern.
- (c) Result in potentially significant and uncertain environmental effects or unique or unknown environmental risks.
 - (d) Significantly affect a federally or state listed threatened or endangered species.
- (e) Either establish a precedent for future action or represent a decision in principle about future considerations with significant environmental effects.
- (f) Adversely interact with other actions which of themselves are insignificant, but which cumulatively affect the environment significantly.
- (g) Involve new missions or facilities that include the production, storage, transportation, use, or disposal of extremely hazardous substances at or above the regulatory threshold planning quantities (as listed in Title 40 of the Code of Federal Regulations Part 355) or requires a Risk Management Program under the Program 3 option of Section 112(r) of the Clean Air Act Amendments.
- (h) Adversely affect human health, the environment, water resources, air quality or land adjacent to or beyond the installation boundary.
 - (2) Actions which typically require (but not limited to) an EIS include but are not limited to the following:
 - (a) Major construction, alteration or significant expansion of a military facility, training area or range.
 - (b) Land acquisition, out leasing or other actions which may lead to significant changes in land use.
- (c) A Continental United States realignment of a brigade-size or larger Table of Organization and Equipment unit during peacetime.
- (d) Training exercises conducted outside the boundaries of an existing military installation where significant environmental damage may occur.
- (3) Notice of Intent (NOI). A NOI is prepared when an EIS is required. It serves as a public notice that an EIS will be prepared and considered.
- (4) Record of Decision (ROD). The ROD is a public document prepared after completion of an EIS. It states the decision made concerning the proposed action and includes the consideration of other essential factors (such as technical and economic analyses) in addition to environmental issues. It identifies mitigations considered important in supporting decisions to include those mitigations that reduce significant impacts.
- (5) The preparation of an EIS comprises a major, scientifically complex project. Proponent for a given action requiring an EIS will not normally have the resources to prepare such a document. ENRD will determine and obtain resources needed to assist the proponent in EIS preparation.
 - (6) For planning purposes, an NOI, EIS and ROD typically require an estimated 1-2 years to complete.
- d. Other requirements and documents. Compliance with NEPA, DOD requirements, US Army Regulations may directly or indirectly include other requirements.
- (1) Record of Non-Applicability (RONA) to the General Conformity Rule of the Clean Air Act. RONAs will be prepared and included in EAs and EISs if applicable. RONAs and related calculations will be prepared and

attached to RECs. See Appendix A for more information. ENRD can provide assistance to the proponent in preparing RONAs. See Appendix A.

- (2) Sedimentation and Erosion Control Plan. Disturbance of 2,500 square feet of soil may require the preparation of a Sedimentation and Erosion Control Plan. Sedimentation and erosion issues associated with a given action must be included in the narrative of EAs and EISs. RECs must include a statement as to whether a Sedimentation and Erosion Control Plan is required and that it has been coordinated with ENRD. These plans should be submitted to ENRD at least 45 days prior to commencement of the action.
- (3) Coastal Zone Consistency Determination (CZCD). Projects must be evaluated to determine if they are consistent with the provisions of the Virginia Coastal Zone Management Act.
- (4) Permits. Actions may require various permits depending on the activity involved. Coordination should be made with ENRD to determine permit requirements.
- e. Non-BRAC Real Property Acquisitions, Leases, Transfers and Disposals. These types of actions require additional review of environmental issues and subsequent documentation.
- (1) Environmental Baseline Survey (EBS). An EBS is a study of the environmental conditions of Fort Eustis/Story property and proposed acquisitions and focuses primarily on hazardous substances and other regulated materials. An EBS is required for acquisitions, leases, transfers and disposals of non-BRAC real property.
- (a) The EBS determines if hazardous substances were stored on the property (for one year or more), released into the environment or structures or disposed of on the property and subsequently indicates whether use of the property represents a hazard to human or the environment. It includes industrial chemicals, heavy metals, PCBs, petroleum products, asbestos, lead-based paint, radon, and unexploded ordinance.
- (b) It serves as a starting point for a Finding of Suitability to Lease (FOSL), Environmental Condition of Property (ECOP) and Finding of Suitability for Transfer (FOST).
- (c) EBS information is incorporated into the affected environment section of an EA and EIS. Additionally, it is a separate document that serves as an appendix or annex of an EA or EIS or as an attachment to a REC. The proponent for the action is responsible for preparing the EBS. See Tab 3 for the EBS format.
- f. Permits, Licenses, Easements and Reassignments within DA, Disposals of Buildings and Improvements Without the Underlying Land, and Privatization of Utilities via Easement. These actions require the preparation of an Environmental Screening Document (ESD). An ESD is used to document performance of an informal site analysis for these types of real estate actions. See Tab 4 for the format. It documents the following actions:
 - (1) An informal visual inspection of the property. This is performed when no apparent indications of contamination at the site exists.
 - (2) Installation facilities records are reviewed and indicate that no evidence of previous contamination exists.
- (3) Installation personnel are queried as to their knowledge of the property history. This includes inquiring as to whether hazardous substances were disposed of, released or buried at the site.
- (4) No indication exists that the proposed action will release hazardous substances. This includes asbestos-containing materials (ACM) and lead-based paint (LBP). ACM and LBP will be removed from those buildings slated for demolition.

D-8. Responsibilities.

a. Commanding General, US Army Transportation Center, will review and approve EIS and accompanying Record of Decision (ROD) when authority is delegated from Headquarters, Department of the Army through TRADOC. Normal EIS approval authority is at Headquarters, DA.

- b. Garrison Commander, Fort Eustis.
 - (1) Review and approve all EAs and FONSIs for Fort Eustis.
 - (2) Review all EISs Fort Eustis before forwarding to the Commanding General, USATC.
- c. Garrison Commander, Fort Story.
 - (1) Review and approve all EAs and FONSIs for Fort Story.
 - (2) Review all EISs for Fort Story before forwarding to the Commanding General, USATC.
- d. Director of Public Works.
 - (1) Review all EAs, FONSIs, EISs and RODs and forward comments to the Garrison Commander.
- (2) Ensure that all DPW actions are coordinated with the ENRD and appropriate environmental impact assessment completed prior commencement of work.
 - (3) Review and approve all EBSs.
- (4) As the proponent of installation-wide Military Construction Army (MCA), Operations and Maintenance Army (OMA), and Family Housing projects/activities, ensure preparation of required environmental documentation before execution of any project/activity.
- (5) Ensure that potential environmental impacts of all minor construction, maintenance and repair projects have been assessed and that the assessment accompanies the DA Form 4283-R (Work Order Request).
 - (6) Approves all RECs.
 - e. Chief, Environmental and Natural Resources Division, DPW.
- (1) Identify one action officer with overall responsibility for managing compliance with NEPA, applicable federal regulations, Department of Defense policy and US Army regulations.
- (2) Provide technical assistance and guidance to proponents on environmental impact assessment of projects and actions. Prepare EAs for installation tenant activities if the Chief, ENRD determines that sufficient resources are available.
- (3) Recommend the appropriate analytical method (REC, EA, EIS) to be used for a given action, project, mission or operation to the DPW and proponent.
 - (4) Reviews all RECs and forwards concurrence/nonconcurrence to the Director, DPW.
- (5) Review all EAs, FONSIs, EISs and RODs. Provide comments through the Director, DPW to the Garrison Commander.
 - (6) Maintain a central file of all completed environmental documents.
 - (7) Prepare and coordinate EAs and FONSIs if division resources are available.
- (8) Prepare and submit all correspondence with the State Historical Preservation Office (SHPO). This coordination is the Virginia Department of Historical Resources (VDHR). The Chief of ENRD is the only executive agent authorized to coordinate applicable actions with the SHPO.

- (9) Conduct all coordination with federal, state, regional and local authorities concerning required environmental documentation for USATC installation actions in coordination with the SJA.
 - (10) Submit all reports to HQ TRADOC regarding environmental documentation as required.
 - (11) Prepares and coordinates Notices of Intent (NOI) to prepare EISs.
 - (12) Publish and distribute NOIs, FONSIs, and other environmental notices as required.
- (13) Has authority delegated by the Garrison Commander to stop any project/action that violates final documentation or any federal, state or local environmental law or regulation until the violations are corrected.
 - (14) Prepares and submits wetlands and pier stab permits with applicable authorities.
 - (15) Inspect projects to ensure track mitigation efforts.
 - f. Master Planning/Real Property will:
 - (1) Prepare RECs, ESDs and EBS' for real property actions.
 - (2) Coordinate actions with ENRD.
 - g. The SJA will:
- (1) Provide legal opinion to proponents concerning the applicability of exemption by law to environmental documentation for proposed actions.
 - (2) Provide other legal assistance concerning required environmental documentation for proposed actions.
 - (3) Review all EAs, FONSIs, EISs and NOIs for legal sufficiency.
- h. The PAO will assist the Commander in preparing for public hearings or public meetings regarding proposed USATC actions and projects.
 - i. Proponents of proposed actions will:
- (1) Incorporate environmental impact assessments into all action planning to ensure timely and effective analysis to determine potential environmental impacts, identify alternatives or means of mitigating effects, and prepare and obtain approval of appropriate documentation.
- (2) Coordinate with ENRD as part of the planning process prior to initiating environmental documentation to determine specific analytical method and documentation (REC, EA or EIS) required for the action.
 - (3) Prepare draft RECs and submit to ENRD for review.
- (4) Coordinate for contract support in preparation of EAs and EISs if installation resources do not exist to prepare such documents. Proponents are responsible for providing adequate funding when an EA or EIS are prepared by contractors.
- (5) Ensure that all final approved documentation (REC, EA, EIS) is adhered to completely once the project/action commences. Ensures that all activity/work is suspended if any changes occur or are anticipated and notifies ENRD immediately of any such changes.
 - (6) Submit draft EAs, FONSIs and EISs to ENRD for review.

- (7) Coordinates with ENRD at least 6 months in advance for assistance in preparing/coordinating wetland and pier stab permits. Performs activity/work in strict compliance with wetland and pier stab permits.
- (8) Ensure that all required environmental documentation for any proposed project is completed and approved, and accompanies other project planning documents during the project approval process. All applicable environmental impact assessment documentation must be completed and approved before the action can begin.
 - (9) Request ENRD support to prepare an NOI for those projects requiring an EIS.
- (10) Ensure that all other environmental compliance requirements are met to include (but not limited to) preparation of Sedimentation & Erosion Control Plan, General Construction Stormwater Permits and Record of Non-Applicability (to the General Conformity Rule of the Clean Air Act). Sedimentation & Erosion Control Plans must be submitted to ENRD at least 45 days prior to commencement of work if 2,500 square feet of soil or sediment is to be disturbed. ENRD is the approving authority for such plans.
 - (11) Prepare a Coastal Zone Consistency Determination for all EAs in accordance with Appendix E.
 - (12) Prepare wetlands/Coastal Zone Management related permit application in accordance with Appendix E.
- (13) Provide ENRD with a list of equipment/vehicles/watercraft, number of each, their horsepower ratings and type of fuel used. ENRD will use this information to prepare a Record of Non-Applicability (RONA) to the General Conformity Rule of the Clean Air Act if appropriate.
 - (14) Ensure actions are considered completely and are not segmented.

D-9. Environmental Resources Potentially Affected by Actions.

- a. General. The broad spectrum of proposed actions ranges from minor to major impacts. These actions may or may not be environmentally sensitive or have a significant impact on the environment. Regardless of the action however, the environmental impact must be evaluated and considered in the planning and decision-making process using the procedures established in this regulation. Failure to prepare and provide necessary environmental documentation may result in unnecessary delays or disapproval of project implementation and possible legal action. Consideration of environmental consequences of a proposed project is not only required by law; the environmental analysis and consequent actions to eliminate or minimize adverse environmental impacts of the project will help ensure continued future mission accomplishment at Fort Eustis and Fort Story.
- b. Environmental Resource Areas. Each action may affect one or more environmental resource in different ways. Subsequently, each resource area must be assessed in terms of impact resulting during the conduct of an action as well as short-term and long-term effects after the action is completed. Effects may be cumulative, thus requiring careful scrutiny. The following resources will be assessed for RECs, EAs and EIS, at a minimum:
- (1) **Air Quality**. The installation must comply with existing state and federal air quality standards. New actions or changes in existing operations may affect air quality. Air quality could be affected by many types of operations including (but limited to) increased traffic flow, increases or changes in the numbers or types of military and installation support vehicles and equipment, controlled burns, boiler plant operations, construction, maintenance operations, use of new or different fuels, increased aircraft operations, emergencies involving the combustion of flammable materials or spilled hazardous substances, use of ozone-depleting chemicals, use of highly volatile chemicals, increased dust emissions and painting operations.
- (2) Water Quality. Water quality issues include effects on groundwater, stormwater runoff, drinking water, sanitary sewer and surface water (such as Skiffes Creek, James River, Eustis Lake, Browns Lake, Snake Lake, Chesapeake Bay, Bailey Creek, wetlands, etc). Various actions may involve the potential discharge of hazardous substances or sediment that may violate existing NPDES, Hampton Roads Sanitation District or stormwater permits. Hazardous substances cannot be poured down sinks or released into drains. Vehicles may leak petroleum products over time. Training exercises or events may involve Reverse Osmosis Water Purification Units (ROWPU) or fuel

bladders. Discharge of chemicals or residues from ROWPUs or fuel bladders into environmental media is not authorized. Construction projects particularly where digging is required may damage water lines. Additionally, such projects may encounter abandoned underground storage tanks that my affect groundwater. The impact of increased water usage must be assessed for those projects requiring such. Certain projects may require special permits.

- (3) Asbestos-containing materials (ACM), Lead-based paint (LBP), Polychlorinated Biphenyls (PCB). ACM and LBP can be encountered during projects involving maintenance, demolition and renovation of structures. Some documents exist regarding these materials in installation buildings and are available at ENRD. Transformers that originally contained PCB-contaminated oil have been replaced with those that do not contain PCB materials. Some Installation Restoration Program sites undergoing remediation may contain PCBs.
- (4) Hazardous Materials and Wastes. Many actions involve the storage and use of hazardous materials. Hazardous materials are considered serviceable products that have a characteristic hazard(s) such as flammability, corrosivity, toxicity, reactivity or combinations of these. Examples include (but not limited to) fuels, petroleum products, hydraulics, paint, solvents, antifreeze, acids, caustics, compressed gases and others. They may pose as hazards to human health, water quality, air quality and wildlife if allowed to evaporate, spill or are improperly disposed of. Failure to document the materials and quantities stored and used may lead to violations of the Emergency Planning and Community Right To Know Act. All hazardous materials must be obtained from the Hazmart; however, contractors performing short-term work may have hazardous materials not documented through the Hazmart. Wastes (both hazardous and non-hazardous wastes) may be generated as a result of use of hazardous materials. Discharge of wastes present the same hazards as hazardous materials. Additionally, depending on the action, large volumes of wastes may be generated overwhelming existing waste management capabilities or violate existing waste management regulations.
- (5) **Noise.** Noise may be generated by a given action that may affect human health or wildlife, pose as a nuisance or disrupt housing areas. Proponents should consider the number and type of equipment or operation, duration (or frequency) of the noise involved, and the decibel ratings of the equipment. This could be an issue with certain construction projects, range firing or training exercises amongst others.
- (6) **Radiation.** Proponents should determine if any equipment contains radioactive sources and if or how such sources could affect human health or the natural environment. Additionally, low-level radiation sources may be encountered in instrumentation of old equipment in some range areas. Known or potential sources should be identified and proper procedures followed prior to commencement of an action.
- (7) Natural Resources. Natural resources include wildlife (both game and non-game species), vegetation, habitat, sensitive ecosystems, soil/sediment, Resource Protection Areas, Conservation Areas, primary sand dunes, wetlands, vernal pools, beaches, sub-aqueous lands, groundwater, and surface water. Virtually any action could affect some or all of these resources in various ways. Proponent shall coordinate with ENRD to evaluate impacts to these resources and help identify means of mitigating the effects. Ground disturbing activities, such as construction projects, storage areas and training exercises should be managed in a manner to prevent habitat alterations and changes in soil drainage. Habitat alterations often lead to destruction or creation of habitat niches which can affect many wildlife species, many of which are experiencing global population declines, such as amphibians. Migratory bird species (which includes the most bird species in Virginia to include song birds, waterfowl, game species and others) may present special requirements or may affect execution of certain projects. Compliance with the Migratory Bird Treaty Act requires avoiding killing, harassing or taking of species or eggs or destruction of nests. Projects must comply with the provisions of the Fort Eustis and Fort Story Integrated Natural Resources Management Plans. Projects must comply with agreements between Forts Eustis/Story and state/local governments concerning the Chesapeake Bay Preservation Act.
- (8) **Historical, Cultural & Archeological Resources.** Several known historical, cultural and archeological sites exist at both installations. Generally, these areas should be avoided; however, coordination should be made with ENRD particularly if project sites are near these areas. Examples include (but not limited to) the Mathew Jones House and Fort Crafford. Digging and excavation may damage existing sites or identify new sites. Subsequently, digging is prohibited in all training areas without prior coordination with ENRD. Digging in the cantonment area requires prior coordination with Engineering Services Division, DPW. Certain areas of Fort Story are listed on the

Virginia Historical Resources District. Alteration of buildings, other structures or areas requires coordination with ENRD prior to commencement of work and may require coordination with the Virginia Department of Historical Resources. This includes projects involving renovation (both interior and exterior) of existing structures or areas. It is unlawful to search for, collect or remove any historical or archeological artifact without appropriate authorization.

- (9) Wetlands and Vernal Pools. Wetlands are those areas that contain certain types of plants, soils and varying degrees of water saturation. Vernal Pools are a type of wetland that are seasonally flooded in forested and non-forested areas. Such areas defined by special criteria and are highly productive because of their recreational value, flood control capabilities, characteristics of contaminant runoff control and wildlife habitat. These areas cannot be partially or completely filled, drained, intruded upon, damaged, or denuded of vegetation without an appropriate permit issued by the US Army Corps of Engineers and possibly the Virginia Marine Resources Commission. Permit applications pertaining to such must be submitted to ENRD in accordance with Appendix E. Any intentional or accidental damage to a wetlands area must be reported immediately to ENRD. The proximity of an action to an adjacent wetland must also be considered.
- (10) **Installation Restoration Program (IRP) sites.** IRP sites are specific areas that had been contaminated by past practices and are listed under the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Such sites are undergoing remediation or are slated for future remedial actions. These areas are generally considered off-limits to digging, construction and most other activities. Several areas at both installations exist. Coordination with ENRD prior to commencement of projects must take place.
- (11) **Threatened /Endangered Species.** Some threatened or endangered species (both federal and state listings) may exist in certain areas. Examples include (but not limited to) bald eagles, tiger beetles, Mabee's salamanders and big-eared bats. Coordination with ENRD prior to commencement of projects is necessary to determine whether such species reside in or near proposed construction sites, ranges, and training areas.
- (12) **Underground and above-ground storage tanks** (**USTs/ASTs**) **and Refueling Operations.** Several USTs and ASTs exist on both installations and also containers brought to the installation by contractors. ASTs also include bulk fuel/petroleum transporters (including fuel barges, tank & pump units, tanker trucks, HEMTs, etc). Care must be taken during refilling of such containers as well as refueling operations involving vessels or vehicles. Additionally, construction projects, tank removal actions, emplacement of new tanks, digging or other activities may pose environmental concerns.
- (13) **Infrastructure.** Existing structures may be damaged during certain projects when care is not taken. Infrastructure may include (but not limited to) buildings, vehicles, landmarks, breakwaters, existing ASTs and USTs, recreational areas, athletic fields, roads, etc.
- (14) **Aesthetics.** It is installation policy that Fort Eustis and Fort Story maintain a clean and visually-appealing presence. Actions shall avoid marring the scenery. Refuse and recyclable materials will be properly managed, petroleum products will be prevented from spilling and leaking onto hardstands, roads, soil and water sources, wastes will be properly containerized, etc.
- (15) **Environmental Justice (Executive Order 12898).** Compliance is mandatory with this executive order. All projects must be reviewed to determine whether it poses a high risk of adverse health to minority or low-income populations both on-post and off-post.
- (16) **Coastal Zone Management.** Actions must be performed without impacting Virginia coastal zones. This requires compliance with the Coastal Zone Management Act. Uncontrolled movement, exc avation or unauthorized use of land areas can lead to problems such as erosion and destruction of critical habitat. This can result from driving vehicles in unauthorized areas or in unauthorized manners, excess horseback riding on beaches or trails, walking or driving on primary sand dunes, excavation of sand from intertidal areas, excavation or dredging of river or stream beds, disturbance of the humus layer above the soil, filling of wetlands and by other means. IAW the Coastal Zone Management Act (CZMA), 15 U.S.C. Subsection 1456 (c), it must be determined whether all proposed actions are carried out in a manner that is consistent with the Virginia Coastal Resources Management Program. Permits for excavation, fill, construction of riprap, pier stabs, emplacement of causeways, modification of

trails, excessive use of trails, and other actions may require a permit. See Appendix E for more information on permit requirements. An EA may be required depending on the scope of altering coastal areas, wetlands, dunes or critical habitat by a given action. Projects must be evaluated to determine whether they are consistent with the Virginia Coastal Resources Management Program. This involves preparation of a coastal Zone Consistency Determination (CZCD).

- (17) **Sedimentation & Erosion Control.** Construction projects that disturb or remove 2,500 square feet of soil (or more) usually require a Sedimentation & Erosion Control Plan. Proponents should coordinate with ENRD to determine whether such plans are required. ENRD is the approving authority for these plans. Once such plans are approved the proponent is responsible for ensuring that the action complies with these plans.
- (18) **Protection of Children from Environmental Health Risks & Safety Risks.** Executive Order 13045 requires that children be protected from hazards associated with a given action. Hazards can consist of hazardous materials, wastes, noise and other types of hazards.
- (19) Excavation, deposition and disposal of soil and sediment. Removal of soil from certain locations as a result of construction projects or dredging operations must be disposed of properly. Depending on the situation, soil or sediment may actually be contaminated. Digging permits must be obtained from DPW which if not coordinated may potentially affect archeological/cultural sites, Installation Restoration Program sites, lead to erosion or contamination. In other cases, improper disposal may create erosion problems or contamination. Subsequently, proponents should coordinate with ENRD regarding actions involving excavation, deposition and disposal of soil and sediment. Additionally, proponents should not accept soil from external sources unless the soil is certifiably free of contaminants. Contaminants may include (but not limited to) heavy metals, pesticides, petroleum hydrocarbons and other chemicals.
- (20) **Solid waste.** Construction, renovation, and demolition projects, changes in land use, removal of vegetation, equipment transfers and other actions may generate large volumes of solid waste (other than waste generated from hazardous materials). Examples include (but not limited to) concrete, rails, lumber, connexes, empty containers, fill material, pallets, momat, equipment debris, discarded equipment parts, trees and other vegetation, and others. Proper disposal is required; however, unmanaged waste generation may preclude or delay disposal, overwhelm existing disposal facilities or affect existing contracts. Proponents should know what types of solid wastes (other than hazardous and non-hazardous wastes) are likely to be generated. Indicate the type and estimated quantities expected, and means of disposal.
- **D-10. Training.** Activities need to be familiar with the federal requirements to assess the environmental impacts associated with actions and projects. Training on complying with the provisions of the National Environmental Policy Act (NEPA) and AR 200-2 is available from ENRD upon request or as needed.

Tab 1 Appendix D

RECORD OF ENVIROMENTAL CONSIDERATION (REC)

TO: Chief, Environmental and Natural Resources Division, DPW

FROM: Proponent

Project Title: Cite the name of project, action, mission or operation.

- 1. Description of action. Provide sufficient details to describe what the proposed action will involve and how it will take place. Description shall include the date the action is expected to take place, the duration of the project, the location(s) where it will occur, number and types of vehicles and equipment involved (include type of fuel each item uses, horsepower ratings and estimated duration of operation), and number of personnel involved. Provide as much details as possible.
- **2. Analysis of environmental resource areas in relation to the action.** The purpose of the REC is to document why no additional analysis is required. RECs must state why no impact to environmental resources will occur as a result of the action. It is insufficient to simply state that no impact exists. Do not state that a resource area is "not applicable". The following environmental resource areas must be assessed.
- a. **Air Quality**. Explain why no environmental impact to air quality is anticipated from the action. However, prior coordination with ENRD is essential to ensure compliance with the General Conformity Rule of the Clean Air Act (A Record of Non-Applicability (RONA) may be required Emissions of oxides of nitrogen and volatile organic compounds from the equipment/vehicles involved must be determined and documented. ENRD will assist in evaluating air quality issues. Include the number and nomenclature of vehicles, an estimate of operating time and horsepower ratings. This information will be needed to determine if a RONA is appropriate. Situations where a RONA is deemed inappropriate, an EA or EIS might be required. Coordinate with ENRD for assistance.
- b. Water Quality. Explain if any discharges of hazardous substances, petroleum, or sediment to water sources are anticipated from the project. This should include any navigable water source (such as Skiffes Creek, Eustis Lake, Chesapeake Bay/Atlantic Ocean, creeks, streams, or ponds), storm drains, drainage ditches or sanitary sewer, or may threaten to reach such water sources. Coordinate with ENRD regarding existing NPDES/VPDES permits, stormwater permits or other permit requirements. Spill prevention techniques used to prevent discharges of hazardous substances to water sources must be addressed in this paragraph. Explain any needs for increased water use during the action.
- c. Asbestos-containing materials (ACM), Lead-based paint (LBP), Polychlorinated Biphenyls (PCB). State if asbestos, lead based paint or PCBs are expected to be encountered during the project.
- d. Hazardous Materials and Wastes. Include the type and estimated quantities of hazardous materials expected to be used as part of the project/action. All hazardous materials must be obtained from the Hazmart. State in this paragraph that "All hazardous materials used during this project will be obtained from the Hazmart" (if hazardous materials are used). In cases where short-term contract work involves hazardous materials that will not be obtained from the Hazmart the proponent must describe the hazardous materials to be used by the contractor, the estimated quantities to be used and ensures that copies of material safety data sheets are attached to the REC. Include any bulk storage containers or vehicles involved. Explain if any wastes (hazardous or non-hazardous) are expected to be generated. Cite the existence of a contingency plan and that it conforms to the USATC Integrated Contingency Plan. Spill prevention techniques used to prevent discharges of hazardous substances to media (soil, storm drainage systems/runoff, other and water sources) must be addressed in this paragraph.
 - e. **Noise.** Describe the anticipated noise issues that may result from the project/action.
- f. **Radiation.** Indicate whether equipment or devices that contain ionizing radiation sources will be used during the project or action. Note whether other sources might be encountered during a given action. Examples might include abandoned equipment that may contain radiation sources.

- g. **Natural Resources.** Natural resources include wildlife (game and non-game), vegetation, ecosystems, soil, Resource Protection Areas, Conservation Areas, primary sand dunes, sub-aqueous land, wetlands, vernal pools, groundwater, and surface water. The proponent shall coordinate with ENRD if the likelihood of impact on such resources exists. Wildlife species (other than endangered or threatened species) associated with the project area shall be considered. This is particularly significant concerning the presence of amphibians. Construction projects should be managed in a manner to prevent the creation of unintentional new micro-habitats such as disturbed soil that receives rain and becomes vegetated. Compliance with the Migratory Bird Treaty Act is mandatory and may present special challenges. Common examples include osprey nesting sites at 3d Port and resident Canada geese but also includes songbirds amongst others. Coordinate with ENRD regarding such issues. Ensure projects do not provision of installation Integrated Natural Resource Management Plans or provisions of the Chesapeake Bay Preservation Act. Request assistance from ENRD in making these determinations.
- h. **Historical, Cultural & Archeological Resources.** Explain why no impact to cultural, historical or archeological resources will not occur. Several known historical, cultural and archeological sites exist at both installations. Generally, these areas should be avoided; however, coordination should be made with ENRD particularly if project sites are near these areas. Digging and excavation may damage or identify new sites. Subsequently, digging is prohibited in all training areas without prior coordination with ENRD. Digging in the cantonment area requires prior coordination with Engineering Services Division, DPW. Certain areas of Fort Story are listed on the Virginia Historical Resources District requiring coordination with ENRD and approval from the Virginia Department of Historical Resources. This includes (but not limited to) renovation or upgrading existing structures especially at Fort Story.
- i. **Wetlands.** Explain why wetlands (to include vernal pools) are not affected by the action. Actions cannot intrude upon, fill, drain damage or threaten wetlands areas without appropriate permits. Project locations shall be coordinated with ENRD prior to commencement. The outcome of coordination with ENRD shall be stated in this paragraph.
- j. **Installation Restoration Program (IRP) sites.** Explain why IRP sites are not affected by the action. Several IRP sites exist at both installations. These areas contain contamination that is either under remediation or for which plans are being developed for eventual remediation. Subsequently, these areas must be avoided. Coordination with ENRD prior to commencement of projects shall take place. The outcome of coordination with ENRD shall be stated in this paragraph.
- k. **Threatened /Endangered Species.** Some threatened or endangered species (federal and state listings) may exist in certain areas. Coordination with ENRD prior to commencement of projects shall take place. The outcome of coordination with ENRD shall be stated in this paragraph.
- l. Underground and above -ground storage tanks (USTs/ASTs). State whether USTs or ASTs will be used during this project or why the action will not affect existing tanks. Digging in the cantonment area requires prior coordination with Engineering Services Division, DPW.
- m. **Infrastructure.** Projects/actions shall be reviewed to determine if damage to existing infrastructure may result. Explain why the action will not alter or damage existing infrastructure.
- n. **Aesthetics.** Indicate whether the action will create adverse landscape or visual anomalies. Explain why or why not.
- o. **Environmental Justice.** Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, 11 Feb 94, 3 CFR 1994) requires proponents to determine whether the proposed action will have a disproportionate impact on minority or low-income communities both off-post and onpost. Compliance is mandatory with this executive order. All projects must be reviewed to determine whether it poses a high risk of adverse health to minority or low-income populations. If the proponent determines that the project does not pose this risk the following statement is included in the REC: "This project does not pose disproportionately high adverse human health and environmental effects on minority or low-income populations residing in the surrounding communities."

- p. Coastal Zone Management. Virginia coastal areas must be protected and cannot be altered or damaged without an appropriate permit at Fort Story, for example, this would include protection of the primary sand dune. This paragraph shall explain whether the project will be accomplished in a manner that is consistent with the Coastal Zone Management Act (CZMA), 15 U.S.C. Subsection 1456 (c). Examples can include uncontrolled movement (via vehicular, foot, horses that leads to serious erosion problems caused by disturbance of the humus layer above the soil), excavation of sand in intertidal areas construction or excavation of riverbeds, stream/creek beds, direct or indirect impacts on wetlands, and alteration of sand dunes. Coordination with ENRD should be accomplished to ensure proper consistency with the CZMA. If consistency with the Coastal Zone Management Act is determined then make the following statement: "IAW the Coastal Zone Management Act (CZMA), 15 U.S.C. Subsection 1456 (c), it has been determined that the proposed project will be carried out in a manner that is consistent with the Virginia Coastal Resources Management Program" and state why this determination is made.
- q. **Sedimentation & Erosion Control.** Virginia regulations require a Sedimentation & Erosion Control Plan if 2,500 square feet (or more) sediment/soil is disturbed. Proponents should coordinate with ENRD to determine whether such plans are required. ENRD is the approving authority for these plans. Cite in this paragraph that coordination has been made with ENRD and whether a plan is required.
- r. **Protection of Children from Environmental Health Risks & Safety Risks.** Executive Order 13045 requires that children be protected from hazards associated with a given action. Proponents shall describe how this will occur or why children are not at risk from a given project.
- s. Excavation, deposition and disposal of soil and sediment. Removal of soil from certain locations as a result of construction projects or dredging operations must be disposed of properly. Describe how excavation, deposition and/or disposal of soil is involved in the action if applicable. Cite the document(s) that confirm soil obtained from sources external to the installation is uncontaminated. Attach a copy to the REC. Digging permits must be obtained from DPW which if not coordinated may potentially affect archeological/cultural sites, Installation Restoration Program sites, lead to erosion or contamination. In other cases, improper disposal may create erosion problems or contamination. Subsequently, proponents should coordinate with ENRD regarding actions involving excavation, deposition and disposal of soil and sediment.
- t. **Solid waste.** Proponents should know what types of solid wastes (other than hazardous and non-hazardous wastes) are likely to be generated. Indicate the type and estimated quantities expected, and means of disposal.
- **3. Anticipated Date and/or duration of Proposed Action.** Indicate the date on which the action will begin and the duration of the project.
- **4. Reasons for Using Record Environmental Consideration.** A Categorical Exclusion (CX) must be obtained from Appendix B, AR 200-2. Cite the paragraph from that appendix that applies to the CX for the action. A project must be evaluated in the short and long-term and include all missions and activities associated with the project. In some cases a REC may be tiered to an existing Environmental Assessment or Environmental Impact Statement. The proponent will coordinate with ENRD to determine if this option is feasible. Cite the name and date of an EA or EIS if applicable. Additionally, the following narrative will be included: "The proponent hereby confirms his/her understanding that the action will comply with the provisions of TCFE Regulation 200-6, Environmental Management. Any changes to the action after approval of this REC will invalidate the REC and require the proponent to cease work and coordinate with ENRD. This may require preparation of a new REC or an EA (or EIS) depending on the situation as recommended by ENRD."

TCFE Reg 200-6

Proponent:		Signature Block	Date:	
CONCUR/NONCONCUR				
Environmental Coordinator:	Chief, Environmental and Natural Resources Divisi			Date:
APPROVED / DISAPPROVED				
	Signature Block	Date:		

Director of Public Works

Tab 2 Appendix D

Record of Environmental Consideration (REC) for Building Renovation Projects

- b. Is categorically excluded under the provisions of categorical exclusion(s) (cite paragraph(s) from Appendix B, AR 200-2: paragraph (c)(1) Construction of an addition to an existing structure.
- 4. Include the following statement: "By signing below the proponent confirms that he/she has made prior coordination with the asbestos and lead-based paint program manager, Environmental and Natural Resources Division to confirm approval of asbestos/lead-based paint management plans (Categorical Exclusion from Appendix B, AR 200-2, paragraph (b)(9) and that the project only involved interior renovation of existing buildings and that the building or the actual renovation/modification is to support administrative operations or occupant comfort. The proponent hereby confirms his/her understanding that the action will comply with the provisions of TCFE Regulation 200-6, Environmental Protection and Enhancement. Any changes to the action after approval of this REC will invalidate the REC and require the proponent to cease work and coordinate with ENRD. This may require preparation of a new REC or an EA (or EIS) depending on the situation as recommended by ENRD."
- 5. Environmental Justice. Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, 11 Feb 94, 3 CFR 1994) requires proponents to determine whether the proposed action will have a disproportionate impact on minority or low-income communities both off-post and on-post. Compliance is mandatory with this executive order. All projects must be reviewed to determine whether it poses a high risk of adverse health to minority or low-income populations. If the proponent determines that the project does not pose this risk the following statement is included in the REC: "This project does not pose disproportionately high adverse human health and environmental effects on minority or low-income populations residing in the surrounding communities."
- 6. **Protection of Children from Environmental Health Risks & Safety Risks.** Executive Order 13045 requires that children be protected from hazards associated with a given action. Proponents shall describe how this will occur or why children are not at risk from a given project

TCFE Reg 200-6

Proponent:	Signature Block	Date:	
APPROVED / DISAPPROVED			
			Date:
	Chief, Environmental and		

Natural Resources Division

Tab 3 Appendix D

ENVIRONMENTAL BASELINE SURVEY (EBS) USATC Fort Eustis, VA

1. PROPERTY IDENTIFICATION:

- a. Installation: State either Fort Eustis or Fort Story, Virginia
- b. Address/Assessor Parcel Number: Example: Fort Story Military Installation, Virginia Beach, Virginia.
- c. Legal Description:
- 2. EXECUTIVE SUMMARY. Provide a brief description of the property that was evaluated and the results (whether use of the property poses a hazard to human health or the environment). Example: The plot of bare land approximately 100 feet by 60 feet, the proposed LCC Telecom Management Services, Inc. (formerly Microcell Management Inc.) telecommunications tower and equipment shelter, and, adjacent areas were evaluated. Based upon the results, the proposed telecommunications facility, which was originally requested by AT&T Wireless Services, would not significantly affect the environment.
- **3. REVIEW OF THE RECORDED CHAIN OF TITLE DOCUMENTS.** Cite the outcome following a review previous title holders. In many cases the property is Army owned and therefore not applicable.
- **4. DESCRIPTION OF PAST AND CURRENT ACTIVITIES ON THE PROPERTY AND ADJACENT PROPERTIES.** Describe how the property was used in the past and existing activities. State if no previous use of property occurred.
- **5. DESCRIPTION OF HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS MANAGEMENT PRACTICES.** Indicate the outcome of reviewing records associated with the property with regards to the storage, use, treatment, release or disposal of hazardous substances (including industrial chemicals, petroleum products, petroleum hydrocarbon residues, radon, asbestos-containing materials, lead-based paint, heavy metals, PCBs, pesticides, other hazardous substance contamination and unexploded ordinance) at the property or adjacent properties.
- **6. RESULTS OF RECORDS REVIEWS, AND VISUAL INSPECTIONS OF SITE, AND OF ADJACENT PROPERTIES (INCLUDING PHYSICAL INSPECTIONS, IF REQUIRED).** Cite the method utilized and documents reviewed in making the determination. Include any sampling and analysis involved. Cite the results of this review. Example: Available records do not indicate any prior use of this property. Inspection of aerial photographs and a physical site inspection identified wetlands within the proposed property and surrounding properties.
- 7. DESCRIPTION OF ON-GOING RESPONSE ACTIONS ON PROPERTY AND ADJACENT PROPERTIES. Describe any on-going site clean-up or remediation actions taking place on the property or adjacent properties. State if no such actions are taking place.
- 8. REFERENCE TO KEY DOCUMENTS EXAMINED. Describe any key documents examined that relate to this action. Example: Environmental Assessment for Implementation of the Master Plan, US Army Transportation Center and Fort Story, Fort Story, Virginia dated October 1996 was reviewed. Construction of a wireless telecommunications tower and facility was not addressed in that document. To ensure this project would be adequately analyzed in accordance with the National Environmental Policy Act, the original requester, AT&T Wireless Services, prepared an Environmental Assessment entitled Environmental Assessment Telecommunications Facility, Fort Story, VA dated September 1998, which resulted in a Finding of No Significant Impact.

9. RECOMMENDED COURSE OF ACTION.

environmental effects considerations, the following course	s of action are recommended (CHECK ONE):
(1) Conduct no further action	
(2) Conduct actions resulting in restrictions of use	
(3) Conduct actions resulting in no restriction on use w General Services Administration (GSA) or other recipient condition.	
(4) In all cases, at a minimum, DA will conduct actions and the environment.	s to a level necessary to protect human health, welfare,
PREPARED BY:	DATE:
Real Property Officer, DPW or Other Proponent	
LEGAL REVIEW:	DATE:
General Attorney, Admin Law Staff Judge Advocate	
APPROVED BY:	DATE:
Chief, Environmental and Natural	

Based on the results of this EBS, as well as pertinent technical feasibility, economic acceptability, and

Resources Division, DPW

Tab 4 Appendix D

ENVIRONMENTAL SCREENING DOCUMENT AND RECORD OF ENVIRONMENTAL CONSIDERATION

To Be Prepared by the Proponent and Reviewed by the Installation Environmental Officer

PART I: Property Description

- 1. NAME OF PROJECT: Provide the name of the project to include the installation. Example: 10 foot rights-of way for electrical and telephone service lines to support a land lease to LLC Telecom Management Services, Inc. to construct a telecommunications facility consisting of a 185 foot cellular tower and equipment building on Coast Artillery Road at Fort Story, VA.
- 2. DESCRIPTION OF REAL PROPERTY AND LOCATION: Describe the real property involved in the project and its location. Descriptions should be thorough. Include the size of the area involved. Example: The proposed site, a bare plot of land approximately 100 feet by 60 feet, is located on Coast Artillery Road on a concrete road at the old abandoned main gate of Fort Story Military Reservation just off Shore Drive (Route 60). The electrical service line will be run from a designated point on Al Jubayl Road to Coast Artillery Road to the proposed telecommunications compound and consist of approximately 23,654 square feet (0.543 acres) which includes 1,218 square feet located within a 35'x35' utility easement area on Fort Story. For the telephone service line, LCC will acquire a fiber optics cable connection from Bell Atlantic. Bell Atlantic will connect from their existing fiber optic cable on Shore Drive, run the new line under Shore Drive to just left of the old abandoned gate on Fort Story, then bury the cable underground for approximately 300 feet and disconnect at LCC's proposed telephone pedestal to be located just inside the south east corner of the proposed telecommunications compound. For both electrical line (Easement "B" and 35'x 35' Easement Area) and telephone service line (Easement Area "A"), refer to the Legal Description Map and Easement Plan provided as Enclosures 2 and 3 to Section B of the Report of Availability.

PART II: NEPA Analysis/Record of Environmental Consideration.

a. State which NEPA documentation was prepared for this project (REC, EA, or EIS). If a document to the REC and make the following statement in this paragraph: "This action me for categorical exclusions in AR 200-2, Appendix B, and the proposed action is categorical (cite appropriate CX paragraph) from requiring further NEPA analysis or documen application of the CX is:	eets the screening criteria ly excluded under CX
OR	
b. The action has been previously assessed in an EA/FNSI or EIS/ROD dated and titled Wireless Services prepared an Environmental Assessment entitled Environmental Assessment Facility, Fort Story, VA dated September 1998.	
PART III: Survey Conclusions (See supporting data in Part IV):	
(CHECK THE APPROPRIATE ENTRY)	
ESD results do not indicate the presence of hazardous/toxic materials or contaminar above, OR the release of hazardous/toxic materials to the environment is not considered pr proposed action	
ESD indicates the possible existence, OR the potential for release of hazardous/toxic proponent must investigate the nature and extent of the contamination, execute reporting are by regulation, determine the threat posed to human health and the environment and reconsilight of these steps.	nd other actions required

PART IV: Supporting Data:

1. Records Check Summary of the Property and Environmental Records: a. Installation Restoration Program Assessment Results (if any): [] There are no IRP documents pertaining to this site. [] IRP documents concerning this site indicate the following: b. CERCLA or RCRA Documents Pertaining to this Site (if any): [] There are no CERCLA or RCRA documents pertaining to this site. [] CERCLA/ RCRA documents concerning this site indicate the following: c. National Historical Register (NHR) or National Historical Register Eligible (NHRE) properties: [] An NHRE survey has been completed for this area and [] There are no NHR/NHRE properties or structures at this site. NHR/NHRE properties or structures at this site include the following: Or: An NHRE survey is scheduled for this particular property for: d. Environmental Compliance Assessment Survey (ECAS) results: [] There are no ECAS results pertaining to this site. [] ECAS results concerning this site indicate the following: e. Survey results for asbestos, radon, lead based paint, radioactive materials, electrical equipment containing PCBs, underground storage tanks, unexploded ordnance, etc., related to this site: There are no survey results pertaining to radon, radioactive materials, electrical equipment containing PCBs, underground storage tanks, unexploded ordnance this site/ survey is not applicable. Specific survey results indicate the following (by type of survey): 2. Summary Results of Property Visual, to include Underlying Land: General condition of facilities, buildings, and improvements (e.g., indications of the presence of contaminants or the possibility of the future release of contaminants due to building conditions): [] There are no visual indications of past or present contamination or hazardous/toxic materials use or storage. The following visual indications were present at the site and may indicate contamination or hazardous/toxic materials presence as described: 3. Summary of the History of Response Actions at the Site: [] There are no records of response actions pertaining to this site. [] The following response actions have occurred regarding the site:

PREPARED BY:	
PROPONENT	Date:
APPROVED:	
	Date:
Chief, Environmental and Natural Resources Division, DPW	

D-23

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Appendix E

Wetland/Coastal Zone Management Related Permits and Consistency Determinations

E-1. Purpose. This appendix provides guidance for obtaining permits required for actions involving dredging or alteration of river and stream beds, discharge of dredge or other fill material (whether to land, navigable waters or wetlands), occurring in proximity to or within wetlands and vernal pools, construction of dams and dikes in navigable waters, construction of structures on or near coastal zone areas (including but not limited to piers, wharfs, weirs, booms, breakwaters, bulkheads, revetments, riprap, jetties, permanent mooring structures, power transmission lines, permanently moored floating vessels, pilings, aids to navigation, other obstacles or obstructions, pier stabs, emplacement of temporary floating causeways excavation of causeway "duck ponds", beach excavation, intertidal zone excavation, and dune alteration or encroachment and may involve temporary or permanent structures including their maintenance, repair, and replacement). Such activities are under the regulatory jurisdiction of the Corps of Engineers and various State and local agencies and require prior authorization via the joint permit program.

E-2. Applicable Regulations.

- a. Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403).
- b. Army Corps of Engineers Permit Program Regulations (33 CFR 320-330).
- c. Section 404 of the Clean Water Act (33 USC 1251 et seq.).
- d. Coastal Zone Management Act (CZMA) (16 USC 1451-1464).
- e. Code of Virginia, Title 62.1, Waters of the State, Ports and Harbors.
- f. Code of Virginia, Title 28.2 1308.
- **E-3. Applicability.** This Appendix applies to all DoD and US Army tenant activities and all non-DoD tenants whose action/project takes place on Fort Eustis or Fort Story.
- **E-4. Policy.** It is installation policy to:
 - a. Maintain at least a one hundred (100) foot buffer from all wetlands.
- b. Avoid filling, excavation of, digging in, driving of vehicles in, releasing hazardous substances into, destruction or removal of vegetation associated with (whether floating, emergent or submerged) or any other activity that otherwise damages, degrades or alters, wetland areas without an approved permit.
- c. Avoid excavating, digging, altering or damaging any coastal area, beach, or primary dune, and associated vegetation without an approved permit.
 - d. When possible, group similar actions into one single application rather than treating them separately.
- e. For ongoing or repeated similar activities, it is preferable to get one permit to cover a long time period, rather than treating each exercise separately.
- f. Plan actions well in advance to compensate for time needed by regulatory agencies to process permits. Permit applications for wetlands and coastal area activity (as described in paragraph 1 PURPOSE) are reviewed by the US Army Corps of Engineers, Virginia Department of Environmental Quality, Virginia Marine Resources Commission and respective municipal Wetlands Board (Newport News Wetlands Board is responsible for the Fort Eustis area and the Virginia Beach Wetlands Board is responsible for Fort Story). The authority of VMRC and Wetlands

Boards exceed the scope of wetland areas. The importance of identifying requirements well in advance cannot be overemphasized.

- g. Activities undertaken without appropriate authorization may lead to legal action taken against the offending party.
- h. Prepare Coastal Zone Consistency Determinations (CZCD) for all projects involving potential or known impacts or alterations of wetlands, subaqueous lands (such as river or stream beds and intertidal areas), and dunes.
- (1) CZCD will determine whether a project is consistent with the provisions of the Coastal Zone Management Act.
- (2) This document is submitted to the Virginia Department of Environmental Quality which is afforded a 60-day review period.
- (3) CZCD are prepared for all Environmental Assessments and submitted to federal and state regulatory agencies with Environmental Assessments.

E-5. Responsibilities.

- a. Proponents for all actions requiring a permit will:
- (1) Review its proposed exercises, training activities, construction projects and other actions. If any of these actions involve regulated activities listed in paragraph 1 above (PURPOSE), the proponent will submit a request for permit application processing and a completed Joint Permit Application (JPA) at least 6 months prior to proposed action to DPW Environmental and National Resources Division (ENRD).
- (2) Complete the basic form JPA and any applicable appendices. The proponent is responsible for providing maps, drawings, and descriptions of the proposed actions as described in the JPA. The JPA is downloadable from http://www.nao.usace.army.mil/Regulatory/PN/JPA.html. Proponents will then submit the JPA to ENRD for processing.
 - (3) Coordinate with ENRD, DPW for a meeting and/or site visit to discuss the proposed action.
 - (4) Be responsible for all associated fees and reimburse ENRD through a cost transfer.
 - (5) Comply with all requirements stated on the approved permit.
 - (6) Report any permit violations to ENRD immediately.
 - (7) When possible, group similar actions into one single application rather than treating them separately.
- (8) For ongoing or repeated similar activities, it is preferable to get one permit to cover a long time period, rather than treating each exercise separately.
- b. Proponents of actions will prepare a CZCD in accordance with Virginia regulations and submit to ENRD for review.
 - c. ENRD, DPW will:
- (1) Submit the JPA to the US Army Corps of Engineers-Norfolk District and Virginia Marine Resources Commission.
 - (2) Provide a public notice for permit applications, as applicable.

- (3) Provide application fee for permit applications, as required but will be reimbursed by the proponent through cost transfer.
 - (4) Provide assistance to proponents in preparation of permit applications and CZCD.

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ENVIRONMENTAL ISSUES

Installation policies and plans are available at the Environmental and Natural Resources Division, DPW, Building 1407 (Washington Boulevard) or by calling 757-878-4123, extension 293.

- ? Fort Eustis Regulation, 200-6, Environmental Management
- ? Pollution Prevention (P2) Plan, June 2002
- ? Integrated Contingency Plan (Spills)
- ? Integrated Natural Resources Management Plan
- ? Integrated Cultural Resources Management Plan
- ? Environmental Help Book
- ? Storm Water P2 Plan
- ? P2 Opportunity Handbook
- ? Household Chemical Exchange Program

ENVIRONMENTAL AND NATURAL RESOURCES DIVISION, DIRECTORATE OF PUBLIC WORKS



US Army Transportation Center ATZF-PWE Building 1407 Fort Eustis, VA 23604-5332 (757) 878-4123, extension 293

Visit our website at:

https://dpwweb.eustis.army.mil/ENRD/ENRDHome/Index.htm

USATCFE Environmental Policy

- a. Comply with all applicable environmental policy, laws and regulations.
- b. Identify potential sources of pollution and meet or exceed Army goals for prevention of pollution.
- c. Assess the effects on the environment of activities, projects, training exercises, products, and services <u>before</u> implementation. Set objectives and targets to minimize adverse environmental impacts. Implement and monitor programs to achieve objectives and targets in our environmental management system.
- d. Conserve and preserve natural and cultural resources so they will be available for present and future generations to use.
- e. Restore previously contaminated sites as quickly as funds become available.
- f. Promote continual improvement in our environmental management system.

ENVIRONMENTAL POLICIES FOR CONTRACTORS AT THE US ARMY TRANSPORTATION CENTER



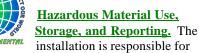
The US Army Transportation Center Fort Eustis (USATCFE) is pleased to provide this information to those seeking to do business on Fort Eustis and Fort Story. The USATCFE has adopted policies that give a high priority to environmental stewardship.

Our principal goal is to reduce harmful environmental impacts to the greatest extent possible. Harmful impacts may come from products utilized by contractors while working on the installation, procedures employed by contractor personnel while working here, or from disposal issues.

Please use this brochure to become familiar with environmental management at Fort Eustis. Please feel free to discuss any of these issues with your

Contracting Officer or Contracting Officer Representative.

HAZARDOUS MATERIAL AND WASTE MANAGEMENT



preparing Section 313 and Toxic Release Inventory (TRI) reports, sent to the Commonwealth of Virginia annually. Contractors providing their own hazardous materials must report usage and storage of hazardous materials on Fort Eustis or Fort Story to the Environmental and Natural Resources Division (ENRD) on a quarterly basis. ENRD can provide a list of materials reportable under the Emergency Planning and Community Right-To-Know Act (EPCRA). POC: Catherine Taylor, (Tel) 757-878-4123 extension 301 (E-Mail) TaylorC@eustis.army.mil

Hazardous Waste. Contractors who use hazardous materials may also generate hazardous wastes. The installation must comply with all Federal and state regulations concerning the storage and transportation of hazardous waste. Contractors generating hazardous wastes must contact the Hazardous Waste Accumulation Facility (HWAF), Building 1208. If you are not sure whether or not you generate hazardous wastes, check with the HWAF. POC: Bill Barnes, (Tel) 757-878-3915 (E-Mail) barnesb@eustis.army.mil

Best Environmental Management Practices.

The installation has an active pollution prevention program plan. The plan includes best environmental management practices to promote waste reduction and a cleaner environment. Contractors should adopt best environmental management practices to keep the Fort Eustis and Fort Story environment clean.

Examples of Best Environmental Management Practices

- Proper hazardous materials storage
- Recycling at the work site

More Examples of Best Environmental Management Practices

- Spill kits available at work site
- Storm water runoff prevention
- Proper disposal of work rags

POC: Linda Rice, (Tel) 757-878-4123 extension 299 (E-Mail) <u>ricel@eustis.army.mil</u>

<u>Spill Reporting.</u> Discharges of oil or any hazardous material into a water source (storm drains, drainage ditches, streams, lakes, ponds, rivers, or any other body of water) must be reported immediately by calling Fire and Emergency Services.

Fort Eustis 911 or 878-1008 Fort Story 911 or 422-7456

This includes when hazardous materials (paint, cleaning compounds, etc.) are washed off tools, vehicles, or equipment into a water source (storm drains, drainage ditches, etc.).

Recycling and Solid Waste Management.

The Solid Waste, Recycling, and Pollution Prevention Center (SWRPPC) is in Building 1209 on Taylor Boulevard. For solid waste disposal and recycling issues that are not addressed contractually, contractors must follow all installation regulations.

POC: W.A. Mantooth, (Tel) 757-878-4232 (E-Mail) mantoothw@eustis.army.mil

Green Purchasing. It is the policy of Fort Eustis and Fort Story to purchase items with the highest recycled content practicable. A list of these items can be found in the Comprehensive Procurement Guidelines published by the Environmental Protection Agency. Visit the Environmental Office website at https://dpw-web.eustis.army.mil/ENRD/ENRDHome/ index.htm and click on Green Purchasing. POC:

web.eustis.army.mil/ENRD/ENRDHome/ index.htm and click on Green Purchasing. POC: Linda Rice, (Tel) 757-878-4123 extension 299 (E-Mail) ricel@eustis.army.mil NEPA. The National Environmental Policy Act (NEPA) requires that consideration be given to the impact of construction and renovation to the environment. Contractors should check with their Contracting Officer Representative to ensure that all NEPA concerns have been addressed.

Asbestos and Lead-Based Paint. Contractors performing work where asbestos or lead-based paint is found must be certified to perform abatement. ENRD has information concerning surveys conducted in various locations on the installation. POC: Steve Strother, (Tel) 757-878-4123 extension 305 (E-Mail) strothers@eustis.army.mil.

Natural and Cultural Resources. The installation ensures that personnel comply with all federal and state laws that pertain to natural resources, including flora and fauna. Contractors doing work that might impact nests, migratory birds, threatened or endangered species, archeological sites, or other resources should contact ENRD. POC: Terry Sanders, (Tel) 757-878-2375, (E-Mail) sanderst@eustis.army.mil

Air Emissions. ENRD tracks air emissions on Forts Eustis and Story. Contractors performing work such as painting, parts cleaning or other activities that could generate fugitive air emissions should contact ENRD. POC: Barbara Hutcheson, (Tel) 757-878-4123 extension 309 (E-Mail) https://doi.org/10.1001/journal.org/

Storm Water. Permits prohibit discharge of anything into storm drains other than storm runoff. Discharges into drains enter waters of Virginia and can result in violations and/or fines. Contractors must define their discharge requirements and coordinate with ENRD before waste stream disposal. POC: Susan Miller, (Tel) 757-878-4123 extension 302 (E-Mail) millers@eustis.army.mil

TCFE Reg 200-6

Appendix G

Hazardous Material Management

G-1. Purpose. This appendix outlines policy, establishes responsibilities, and provides operating guidance to meet federal, state, and Army requirements for hazardous material management.

G-2. Definition of hazardous materials.

- a. As used in this regulation, the term "hazardous material" (HM) is a serviceable product which requires special management because in a particular form or quantity it has hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity) that may pose a risk to human health or the environment. A HM is not a hazardous waste (HW), and the regulatory requirements for the management of each are not the same. HMs become HW or Non-Hazardous Waste (NHW) when they can no longer be used for the intended purpose and must be discarded for disposal. HMs designated for disposal must be managed as HW or NHW. See Appendix H, *Hazardous Waste Management*, this regulation, for management of HW and NHW.
- b. HMs are used in many processes that are essential for daily mission activities at Fort Eustis and Fort Story. These HMs will be managed in accordance with (IAW) the requirements provided or referenced in this appendix.
- c. The management of HM is an integral part of the Fort Eustis and Fort Story Pollution Prevention Program and compliance with the provisions of the Emergency Planning and Community Right To Know Act (EPCRA). The requirements of this chapter are consistent with and support the pollution prevention actions described in Appendix Q, *Pollution Prevention and Sustainability*, of this regulation.

G-3. Key regulations, orders, and laws.

- a. Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, and AR 710-2, *Supply Policy below the Wholesale Level*, both require the establishment of a Hazardous Material Management Program.
- b. DA Pamphlet 200-1, *Environmental Protection and Enhancement*, provides technical and procedural information, and further defines policy and responsibilities as directed by AR 200-1.
 - c. Technical Manual 38-410, Storage and Handling Hazardous Material, provides guidance for daily operations.
- d. DOD Regulation 4160.21M, *Defense Reutilization and Marketing (DRMO) Manual*, outlines procedures for procurement of hazardous materials for DOD activities.
- e. DOD Regulation 4145.19-R-1, *Storage and Material Handling*, identifies proper storage and material handling for DOD activities.
- f. OSHA Code of Federal Regulations (CFR), Title 29 CFR 1910.1200, identifies the federal standards for Hazard Communication including proper labeling of hazardous materials.
 - g. OHSA Title 29 CFR 1910.120 provides the training requirements for handling hazardous materials.
- h. OHSA Title 29 CFR 1910.176-1910.181, 1910.184, and 29 CFR 1911 encompass the regulations for proper handling and storage of hazardous materials.
- i. EPCRA Title 40 CFR 355 provides information and the list of extremely hazardous substances (EHSs) for reporting to comply with provisions of the Planning and Community Right-To-Know Act (EPCRA).

- j. EPCRA Title 40 CFR 370 provides information for the Emergency and Hazardous Chemical Inventory (also referred to as the Tier Two report).
- k. EPCRA Title 40 CFR 372 provides information and the list of reportable chemicals and thresholds for the Toxic Chemical Release Inventory (TRI) Report.
- 1. CAA Title 40 CFR 68 provides information for compliance with Section 112(r) (Accidental Release Prevention) of the Clean Air Act Amendments.
- m. Executive Order 13148, *Greening the Government through Leadership in Environmental Management*, directs Federal agencies to ensure all necessary actions are taken to integrate environmental accountability into agency day-to-day decision making and long-term planning processes, across agency mis sions, activities, and functions.
- n. The Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986 directs reporting of hazardous materials on the Toxic Chemical Release Inventory (TRI) Report and the Emergency and Hazardous Chemical Inventory (also referred to as the Tier Two report).
- o. The Clean Air Act Amendments, Section 112(r) (Accidental Release Prevention) directs organizations to develop procedures and take actions to prevent accidental releases of hazardous materials.

G-4. General.

- a. All activities are required to maintain accountability for and document the flow of hazardous materials from the point of receipt to the point of turn-in for disposal. This includes quantities returned to the supply system, HazMart, used or consumed, released to the environment and/or disposed.
- b. All Commands down to battalion or separate company/detachments, and Directorates down to division level will appoint and train one primary and one alternate Activity Environmental Coordinator (AEC) to be the Hazardous Materials Manager/Supervisor for their unit/activity, IAW Chapter 2-7 of this regulation.
- c. Material Safety Data Sheet (MSDS) management is the responsibility of tenant activities that store or use hazardous materials. These documents should be organized and updated periodically, and should be available to all personnel who handle hazardous materials. The HazMart issues material safety data sheets to customers when receiving a hazardous material that is new to the Hazmart or if the MSDS was requested by the customer. Other sources for MSDSs include calling the manufacturer of the product and the Hazardous Materials Information Resource System (HMIRS) at www.dlis.dla.mil/hmirs.
- d. Personnel who handle or use hazardous materials must be trained IAW Appendix C, *Training Requirements*, of this regulation.

G-5. Acquisition of hazardous materials.

- a. The HazMart will effectively manage hazardous materials by reducing the acquisition of hazardous materials and reducing the amount of waste generated. Added benefits include better health and safety practices and better regulatory compliance. Environmentally Preferable Products, i.e., less hazardous, will be chosen when possible.
- b. HazMart Customers: The HazMart provides centralized acquisition, storage, distribution, and management of hazardous materials utilized by base operations and tenants working within the fence lines of both installations.
- (1) All hazardous materials must be purchased from the FE HazMart or the Naval Amphibious Base (NAB) HazMin Center/Little Creek for Fort Story activities, IAW Chapter 2-9c of this regulation. Activities may not use credit cards or GSA accounts to purchase hazardous materials, unless the materials appear on the exemption list. Copies of the FE & FS USATC *HazMart Informational Handbook* maybe obtained from the FE HazMart, Bldg 1205.

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- (2) All activities will maintain an accurate and up to date Authorized Use List (AUL) with the HazMart. Activities will update the AUL at least annually.
- (3) Activities are only allowed to keep a 7-day supply of HMs on-hand. HMs not on the activity's Authorized Use List (AUL) will be ordered through the HazMart after receiving approval for the new product from the ENRD Hazardous Materials Manager.
- (4) Activity Deployment. The HazMart will not keep a continual "deployment stock" on hand in case of deployments. For an actual deployment, units are required to notify the HazMart as soon as possible of all HMs the unit will need for that deployment. To allow time for the HazMart to obtain any HMs they do not stock that are needed for deployment, units should tell the HazMart their needs, items and quantities, NLT two weeks before the HMs are needed by the unit.
- (5) Activity Redeployment. Upon redeployment, HMs purchased from other sources must be reported to the ENRD Hazardous Materials Manager including an MSDS and total quantity on had for each product.
- (6) Pesticides. Units on Fort Eustis and Fort Story are prohibited from obtaining or using pesticides. The only activities authorized to obtain and use pesticides is Fort Eustis DPW and the Navy PWC for Fort Story. If personnel from DPW or PWC want to obtain new pesticides, the order must be approved by both the ENRD Hazardous Materials Manager and the Installation Pest Control Coordinator before ordering the new pesticides through Hazmart. All other units will request pesticide application through the DPW Service Order Desk. See Appendix U, *Pesticides*, of this regulation for further information.
- **G-6. Hazardous material identification.** It is essential that hazardous materials are accurately identified to insure safe storage, handling and disposal. Title 29 CFR 1910.1200 provides the requirements for proper labeling of hazardous materials.

G-7. Transportation.

- a. Transportation of HMs is highly regulated by DOT and must meet stringent requirements. DOL, Transportation Division should be contacted for additional on-post and off-post transportation requirements.
 - b. On-Post transportation must meet the following requirements:
- (1) Only government approved or licensed contractor vehicles should be used. HazMart will not issue HMs to personnel in POVs.
 - (2) Vehicles will have fire extinguishers appropriate for the type of materials being moved.
 - (3) If containers have free liquids, then a spill kit will be carried.
 - (4) Containers will be secured to prevent movement of containers or spills.
- **G-8. Storage.** Storage of HMs including management of HM storage sites will be conducted IAW Appendices I, *Container Management*, and K, *Storage and Accumulation Site Management*.

G-9. Handling and use.

a. Before handling or using any hazardous material, always check the label and/or MSDS, which identifies contents, hazards, and precautions.

b. Technical Manual: The Joint Service "Storage and Handling of Hazardous Material Manual," dated 13 January 1999, is an essential reference for those responsible for the proper storage and handling of a wide range of hazardous materials within the government. The manual (TM 38-410) is available in Portable Document Format (pdf) from the Hazardous Technical Information Services (HTIS) web site at http://www.dscr.dla.mil/htis/htis.htm. The document is also available via a link to the HTIS web site from your service component sector on the Defense Environmental Network & Information Exchange (DENIX) web site at http://www.denix.osd.mil/denix/Public/Policy/policy.html.

G-10. Inventory and reporting.

- a. Hazardous material inventory data collection. Data concerning hazardous material inventories is collected from the HazMart and activities each quarter based on a calendar year. This data represents documentation required to meet the installations' compliance with the Emergency Planning and Community Right to Know Act (EPCRA). See Tab 1 of this Appendix for HazMart, activity, and installation procedures for hazardous material inventory reporting.
- b. EPCRA requires specific reporting requirements. Such requirements include the Emergency and Hazardous Chemical Inventory (Tier Two) and Toxic Chemical Inventory (Form R). The Emergency and Hazardous Chemical Inventory is submitted to the State Emergency Response Council (Virginia Department of Environmental Quality), respective Local Emergency Planning Committees (see Chapter 3 of this regulation) and respective local fire departments. The Form R is submitted to the Environmental Protection Agency Region Three and the Virginia Department of Environmental Quality. The Tier Two report provides information to emergency planners and responders in the event of a chemical accident. The Form R report provides information concerning releases of hazardous materials as a result of use of certain toxic chemicals. Such information includes quantities and types of pollutants released into media (air, land and water) and transferred off site as waste. Both reports become public record. Hazardous material inventory data is used to meet these requirements.
- c. Section 112(r) of the Clean Air Act Amendments require that Risk Management Programs and Risk Management Plans be prepared and implemented if the regulated substances are stored or used above the respective regulatory quantity or other regulatory criteria is met. Additionally, Fort Eustis and Fort Story are subject to the General Duty Clause of Section 112(r) of the Clean Air Act Amendments. This states that all handlers and users of any hazardous substance must identify associated hazards, design safe facility operations, prevent releases, and minimize consequences of releases.
- d. Hazardous material inventory data collection also serves as an audit trail for risk management, waste minimization, identification of less toxic substitutes, cost-saving measures and various other pollution prevention activities.
- **G-11. Hazardous material inspections.** Accident prevention surveys and inspections and sound operating procedures are among the principal elements of a total safety and health program. In addition to these inspections, organizations are subject to both announced and unannounced inspections conducted by state and federal agencies under authority of the Federal Facilities Compliance Act (FFCA), Title 29 CFR and 40 CFR. Appendix J, *Inspections*, of this regulation contains HM inspection information.

G-12. Disposition.

- a. Disposition of HMs does not necessarily imply disposal, which is a waste operation.
 - (1) HMs no longer needed for the original process may be reused for another process.
- (2) HMs may be returned to the Hazmart for restocking. The Hazmart will make a determination based on several factors, for example: condition, date, demand, etc., to determine if the HMs can be re-stocked.
 - (3) In a limited number of cases, HMs may be recycled.
 - b. HMs may have to be "wasted out" as Hazardous Wastes or a Non-Hazardous Wastes.

G-13. Training. Federal, State, and Army regulations require that individuals who perform functions associated with the storage or use of HM or with the management of HW be trained for the functions performed. The design and conduct of personnel training programs can reduce serious injury and provide for environmental protection. Appendix C, *Training Requirements*, addresses environmental training requirements for all personnel that use, store, or handle HMs.

Tab 1 Appendix G

Reporting For EPCRA

- **1. Purpose.** This tab outlines policy, establishes responsibilities, and provides operating guidance to for hazardous material inventory reporting, munitions expenditure reporting, and transient aircraft/vehicle refueling reporting to comply with the Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986.
- 2. General. Hazardous Material Inventory & Munitions Expenditure Reports are used to support installation compliance with EPCRA, Executive Order 13148, and Section 112(r) Clean Air Amendments. Hazardous Material Inventory & Munitions Expenditure Reports are due to the ENRD Hazardous Materials Manager quarterly, covering the entire calendar year. Reports are prepared in accordance with this Tab of Appendix G and supplemental memorandums published quarterly.

3. Installation procedures.

- a. EPCRA requires specific reporting requirements. Such requirements include two reports, which are forwarded to the Commonwealth of Virginia, Local Emergency Planning Committees, and the Environmental Protection Agency. These two reports consist of the Tier Two report (Emergency Response Information) and the Form R report (Toxic Release Inventory). The Tier Two report provides information to emergency planners and responders in the event of a chemical accident. It is submitted to the State of Virginia and Local Emergency Planning Committees by March 1st of each year. The Form R report provides information concerning releases of hazardous materials as a result of use of certain toxic chemicals. Such information includes quantities and types of pollutants released into media (air, land and water) and transferred off site as waste. The Form R report is due by July 1st of each year. Both reports become public record. Hazardous material inventory data is used to meet these requirements.
- b. The ENRD Hazardous Materials Manager is responsible for completion and submission of the Tier Two and Form R reports for both Fort Eustis and Fort Story to include all data collection, compiling, and calculations.
- c. Both reports are signed by the Garrison Commander before submission to the correct organizations mentioned above.

4. Hazmart procedures.

a. The Hazmart database administrator is required to submit quarterly electronic files of all Hazmart transactions for Fort Eustis through the FE Hazmart and of all Fort Story transactions through the Little Creek Hazmart. This data will include, but is not limited to, the National Stock Number (NSN), Product ID/Name, Manufacturer, MSDS #, Unit of Issue, Quantity of Issue, Name of Purchasing Unit, Location of Purchasing Unit, and POC from Purchasing Unit for each transaction.

5. Unit/activity procedures.

- a. Hazardous Material Inventory Reporting.
 - (1) This requirement pertains to all tenant activities at Fort Eustis and Fort Story.
- (2) All tenant activities are required to obtain all hazardous materials from the Hazmart. This requirement is delineated in this regulation in Appendix G, *Hazardous Material Management*.
- (3) All tenant activities are required to submit Hazardous Material Inventory Reports that consist of a memorandum and a compressed gas cylinder inventory (see figures 1-3, below). This memorandum should include of a list of hazardous material storage and use locations. Examples of storage and use locations include building numbers or vessel numbers. An example of the memorandum is found at figure 1. **The compressed gas cylinder**

inventory is only required if an activity has obtained compressed gases from sources other than the Hazmart. Instructions for completing the compressed gas cylinder inventory are provided in figure 3 below. Additionally, any other hazardous material (and quantities on hand) obtained from sources other than the Hazmart must be listed on the memorandum. Copies of material safety data sheets for these materials must be attached. Memorandums must be signed by the proper chain of command (examples of individuals with signatory authority include battalion commanders, division chiefs, and directors).

- (4) Information on compressed gases obtained from sources other than the Hazmart must be provided. The information required is noted in the memorandum at figure 1 and the Compressed Gas Inventory Form at figure 2. Instructions for completing the form are provided at figure 3. Known or estimated quantities of compressed gases must be provided in "cubic feet" units. Compressed gases obtained from the Hazmart do NOT need to be reported. Examples of compressed gases include gases (gaseous phase and liquefied phase) contained in cylinders such as argon, acetylene, oxygen, liquefied oxygen, propane, helium, carbon dioxide, nitrogen, hydrogen and chlorine.
- b. Munitions Expenditure Reporting. Directorate of Plans, Training, Mobilization & Security (DPTMSEC), Aviation Applied Technology Directorate (AATD), Explosive Ordnance Disposal Training & Evaluation Unit Two (EOD TEU TWO), and Fort Story Operations. These installation tenants and activities are requested to provide a Munitions Expenditure Report in addition to the Hazardous Materials Inventory Report. The Munitions Expenditure Report should include the following information for all military munitions expended, fired, detonated, exploded or otherwise used on ranges and training areas at Fort Eustis and Fort Story in the time period specified in the supplemental memorandum published quarterly: proper nomenclature, National Stock Number, DODIC, installation on which munitions were expended (Fort Eustis or Fort Story), and number of munitions expended. Military munitions include all types of munitions utilized for military purposes. Examples include but not limited to ammunition for individual and collective weapon systems, blank rounds, pyrotechnics, smoke grenades, CS grenades, CS capsules, demolitions devices, and others. Do not include munitions that remain in storage and have not been expended, fired, detonated, exploded or otherwise used. The Munitions Expenditure Report does not require any special format as long as the above information is provided for each munition.
- c. Transient Aircraft/Vehicle Refueling Reporting. Aviation Division, DPTMSEC. Provide the total quantity of fuel used to refuel transient aircraft in the report time period specified in the supplemental memorandum published quarterly. Transient aircraft is defined as aircraft that do not have any mission or training at Fort Eustis but stop here only to refuel.
- **6.** Contractors and vendors. Contractors and vendors who transport, handle, store and use hazardous materials on Fort Eustis and/or Fort Story must complete an initial Hazardous Material Inventory, submit it to the ENRD Hazardous Materials Manager, and then submit updates on a quarterly basis.

OFFICE SYMBOL	Date
MEMORANDUM FOR Director of Public Works, ATTN: ATZF-PWE (Taylor)	
SUBJECT: Quarterly Hazardous Material Inventory Report	
1. This report is submitted for 1st Quarter, CY 2002.	
2. Hazardous materials for this activity/tenant are stored at the following locations:	
3. The following information is required for compressed gases obtained from sources other than the	ie Hazmart:
Org. User POC Phone # Color Capacity (ft3) Type of Gas Owner	Bldg No
If the tenant activity does not use any compressed gases or if the Hazmart provides all comprehen a Compressed Gas Inventory is <u>NOT</u> required. In this case provide one of the following	
a. "No compressed gases are stored or used by this organization during this reportin compressed gases are maintained by the organization.	g period.", if no
Or	
b. "All compressed gases are provided by the Fort Eustis Hazmart."	
4. The following hazardous materials were obtained from sources other than the Hazmart (if applied	cable):
<u>Trade Name</u> <u>Quantity Source</u> <u>MSDS Attached</u>	
5. Point of contact is	
AUTHORIZED SIGNATURE BLOCK	

Figure 1

Compressed Gas Inventory Date of Report:

*A = ACTIVE; AB = ABANDONED; U = UNSERVICEABLE; E = EMPTY

SERIAL #	ORG	POC	РН#	CLR	CAP (ft3)	TYPE GAS	OWNER	РН#	STATUS	BLDG#	HYDRO TEST

Figure 2

Instructions for Completing the Compressed Gas Cylinder Inventory

Complete this inventory as a component of the quarterly Hazardous Material Inventory Report ONLY if your organization procures its compressed gases from sources other than the Hazmart.

- 1. General. The U.S. Army Transportation Center is subject to the Emergency Planning and Community Right To Know Act (EPCRA) and the Clean Air Act Amendments (CAAA) of 1990. Both are federal laws with subsequent regulations requiring an inventory of all hazardous materials to include compressed gases. Compressed gases are those hazardous materials maintained in cylinders under pressure and obtained from sources other than the Hazmart. Such hazardous materials typically include oxygen, acetylene, carbon dioxide, helium, argon, chlorine, hydrogen and nitrogen. In some cases the gas may actually be in a liquefied state.
- 2. Instructions. Provide the requested information for <u>EACH cylinder</u> used by the tenant/activity that has been procured from sources other than the Hazmart. Most of the requested data can be easily derived from markings on the cylinder or by contacting the supplier.
 - a. SERIAL NO. Leave blank.
 - b. ORG. Enter the name of the organization that uses the cylinder.
 - c. POC. Enter the organization's point of contact for management responsibility for the cylinder.
 - d. PH#. Enter the phone number of the organization's point of contact.
 - e. CLR. Enter the color of the cylinder. The color of the cylinder depends on its contents.
- f. CAP (ft3). Enter the capacity of the cylinder. This must be reported in cubic feet (ft3). This information can be obtained from the cylinder or by contacting the supplier of cylinder. In some cases this may be stamped or engraved on the cylinder. Do not use "pounds per square inch" or "PSI".
- g. TYPE GAS. Note the type gas in the cylinder. This includes oxygen, acetylene, carbon dioxide, helium, argon, hydrogen, chlorine and nitrogen, and possibly other gases. Hazardous materials contained in cylinders obtained from the Hazmart/Little Creek Haz Min Center do not need to be included here. Additionally, cylinders containing compressed air such as those used for diving do not need to be included.
- h. OWNER. Provide the name of the supplier of the cylinder. This normally pertains to cylinders owned by the supplier of the gas.
 - i. PH#. Enter the phone number of the owner/supplier of the cylinder.
 - j. STATUS. Leave blank.
 - k. BLDG#. Enter the number of the building where the cylinder is stored or used.
 - 1. HYDRO TEST. Leave blank.

Figure 3

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Appendix H

Hazardous Waste Management

H-1. Purpose.

- a. Establishes policy, responsibilities and procedures for managing Hazardous Wastes (HWs), Universal Wastes (UWs), and Non-Hazardous Wastes (NHWs) that are generated and managed by Activities on of Fort Eustis and Fort Story.
- b. Implements Installation policy to for complying with Department of Army, federal, state and local policies and regulations.

H-2. General Hazardous Waste Management (HWM).

- a. The US Environmental Protection Agency (EPA) and the Commonwealth of Virginia, Department of Environmental Quality (VDEQ) consider each installation to be a single facility and generator of solid waste. Each installation is ultimately responsible for the proper management of hazardous materials and for all wastes generated on post, regardless of which activities actually manage hazardous materials or generate the waste. Each installation has its own EPA identification number (EPA ID) and mailing address, which must be, used on documents, e.g., official correspondence, manifests, labels, etc.
 - (1) Fort Eustis:

EPA ID Number: VA8213720321

Fort Eustis US Army Transportation Center ATTN: ATZF-PWE, Bldg 1407 Fort Eustis, VA 23604-5332 757-878-3915

(2) Fort Story:

EPA ID Numb er: VA 1213720815

Fort Story US Army Transportation Center ATTN: ATZF-PWE, Bldg 1407 Fort Eustis, VA 23604-5332 757-878-3915

- b. Each installation is designated as a Large Quantity Generator of hazardous waste (LQG):
- (1) LQG: LQGs generate 1000 kg or more per month during any calendar year. LQGs must properly ship Hazardous wastes within 90 days of the accumulation start date (ASD).
- (2) The installations are only allowed to accumulate hazardous wastes in Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs).
 - (3) Accumulation Start Date (ASD): The ASD is a key compliance date for Hazardous Waste Management

(HWM) and Universal Waste Management (UWM). The ASD sets in motion when other actions must occur. The ASD must be assigned to a container of Hazardous Waste when HWs are first added to the container at a TSS or when the quantity limitation is reached at a SAS. The ASD must be assigned to a container of Universal Waste when UWs are first added to the container or the container is issued by the HWAF. Once the ASD is placed on a container, it cannot be changed. The "shell game" of moving a container from one accumulation area to another or re-containerizing the hazardous or universal waste does not restart the ASD. *Do not falsify the ASD*.

- (4) Each TSS and SAS must have a site specific Hazardous Waste Contingency Plan (HWCP) or Hazardous Material and Waste Contingency Plan (HMWCP).
- (5) AECs, HWCs, HWSs, UWHs, and HWHs must meet specific training requirements. See Appendix C for training requirements.
- c. Activities are required to comply with all HWM requirements at all times. Mismanagement of hazardous materials may be considered illegal HWM activity.
- d. Hazardous Wastes (HWs) are defined as a solid waste that poses a potential hazard to human health or the environment when not properly managed due to its ignitable, corrosive, reactive, or toxic properties.
- e. Non-Hazardous Wastes (NHWs) are defined as a special solid waste not meeting the definition of a hazardous waste and originating from hazardous chemicals or hazardous materials.
- f. Universal Waste (UW) applies to a limited number of wastes that would otherwise have to be managed as Hazardous Wastes (HWs), e.g., batteries, lamps, pesticides, and mercury containing thermostats. Mismanagement of UWs will cause them to be managed as HWs. Mismanagement of UWs will be considered illegal HWM activity.
- g. Hazardous Wastes (HWs) and Non-Hazardous Wastes (NHWs) will only be accumulated in Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs).
 - h. Activity Environmental Coordinators (AECs) may act on behalf or in lieu of HWCs.
- i. Activity level HWM Organization: For HWM purposes, AECs will provide management oversight of HWCs; HWCs will provide management oversight of HWSs and or HWHs; and HWSs should provide management oversight of HWHs.
- j. Copies of all HWM records will be kept for at least three years. This includes training records, turn-in documents, inspection forms, etc.

H-3. Key applicable regulations.

- a. Resource Conservation and Recovery Act (RCRA).
- b. 40 CFR 260 Series Hazardous Waste Management System.
- **H-4. Activity Waste Identification:** Each Hazardous Waste, Non-Hazardous Waste, and Universal Waste that an activity generates must be properly identified and classified.
- a. Waste Description Logs (WDL): A written description prepared by the generating Activity of the waste which includes: names, quantities, and National Stock Numbers (NSNs) of HMs used (See the activity's AUL); names and quantities of non hazardous materials used; and a description of the process used to generate the waste. The TCFE Form 646 (Figure K-2) will be used.
 - b. Activities must plan for anticipated waste generation prior to actual waste generation.

- (1) Prior to generation: The WDL should be prepared based on the materials to be used and the proposed operational process.
- (2) Post Generation: In addition to the above documentation for prior generation, laboratory analysis may be required.
- (a) Generating activities knowledge may be used for unused commercial products or when the hazardous constituents from specific processes are well documented.
- (b) Laboratory analysis will be used in other cases because often MSDS or product specifications are not sufficient to properly identify wastes.
 - (3) Laboratory analysis will used for "unknown materials".
- b. Laboratory analysis: When laboratory analysis is required either due to an "unknown" situation or a poorly characterized waste, immediate priority must be given. The 90-day clock starts when the solid waste was generated or the "unknown" was discovered. Coordination with the HWAF is required ASAP.
- (1) It's the activity's responsibility to fund for analysis. All purchase requests through contracting or other sources by the activity for sampling and analysis of waste streams will be coordinated with HWAF. Most sampling and analysis will be arranged through the HWAF and paid by Activity credit card.
- (2) HWAF will secure sampling and analysis for activities as follows (all costs will be the activity's responsibility and paid by the Activity's government credit card):
 - (a) Sampling and analysis of unknown materials upon request.
 - (b) Sampling and analysis of poorly characterized materials or wastes.
- (c) Periodic sampling and analysis of wastes turned in at the HWAF or accumulated at SASs and TSSs for the installation's QA/QC program. Activities should plan on sampling each waste stream annually.
 - (3) DPW-ENRD will assist when "abandoned" containers have been reported to the Military Police.

H-5. Waste Stream Classification:

- a. Based on the information provided by the activity on the Waste Description Log, the HWAF will make a HW determination and classify the waste. It is extremely important that information provided by the activity is accurate! Misclassification of wastes is a major violation.
 - b. The HWAF verifies that the material is a SW and determines if any exceptions or exclusions can apply.
 - c. The HWAF determines if the SW meets the definition of a HW, if it meets any of the following criteria:
 - (1) It is a listed HW if:
- (a) "P" Listed (Acutely HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the "P" list. Waste codes start with "P", e.g. P001.
- (b) "U" Listed (Toxic HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the "U" list. Waste codes start with "U" e.g. U001.
 - (c) "F" Listed: Mostly spent solvents from non-specific sources. Waste codes start with "F" e.g. F001.

- (d) "K" Listed: Mostly wastes from specific manufacturing sources. Waste codes start with "K" e.g. K001.
- (e) Container residues or spill residues from listed wastes.
- (f) Mixture of SW and a listed hazardous waste.
- (2) It is a Characteristic HW, if it exhibits any of the following characteristics (See Glossary for definitions):
- (a) Ignitability.
- (b) Corrosivity.
- (c) Reactivity.
- (d) Toxicity.
- (e) Mixture of SW and characteristic HW, only if the resulting mixture exhibits a characteristic of a HW.
- d. If the SW does not meet the definition of a HW and originated from a HM or HC, then it is classified as a Non-Hazardous Waste (NHW).
 - e. The HWAF will match the waste to an existing material profile or create a new profile.
- f. Waste Tracking: Each container of waste must be tracked from origin to the final disposal. Various reporting requirements must be accomplished during this multi-year process.
- **H-6. Temporary Storage Sites (TSSs) and Satellite Accumulation Sites (SASs):** Appendix K provides all the specific procedures to be used for managing TSSs, SASs.
- **H-7. Management of Containers.** Appendix I provides all the specific procedures to be used for managing containers.

H-8. Transportation.

- a. On-Post movements of HWs, UWs, and NHWs must meet the following requirements:
- (1) Only government approved or licensed contractor vehicles will be used to move HWs, UWs, or NHWs Absolutely no POV's.
 - (2) The HWC or AEC will supervise all movements of HWs and NHWs.
- (3) Vehicles moving HWs, UWs, and NHWs will have fire extinguishers appropriate for the type of materials being moved.
 - (4) If containers of HWs, UWs, or NHWs have free liquids, then a spill kit will be carried.
 - (5) Vehicles must be placarded IAW DOT regulations as a guideline.
- (6) A correctly completed DD Form 1348-1A, Turn-in Document IAW TAB 1 and or Container Content Log (CCL), will serve as shipping documentation.
 - (7) A correctly completed Container Content Log (CCL) IAW Appendix I TAB 1.

- (8) Containers will be secured to prevent movement or spills.
- (9) HWs will not be stored on vehicle(s) overnight.
- b. Licensed Transporters. Only licensed transporters of HWs or UWs, will be allowed to transport HW or UWs, off either installation. These transporters will meet all requirements of DOT, EPA, and DEQ. No licensed transporter will bring HW or UWs onto either installation or between installations unless the HW or UWs is already correctly manifested and the licensed transporter is scheduled for pick up of HW or UWs at Fort Eustis or Fort Story.

H-9. General Disposal.

- a. Activities will use the HWAFs for turn-ins or coordination of shipments of HW, UW, or NHW.
- b. The HWAFs at Fort Eustis and Fort Story are operated by DPW-ENRD. The HWAF staffs are there to assist you, however they will not do your work for you.
 - c. All services offered by the HWAFs must be scheduled IAW TAB 2.

H-10. Non-Hazardous Solid Wastes and Special Solid Wastes.

- a. The following hazardous and special solid wastes must be coordinated and or turned-in to one of the HWAFs:
 - (1) Hazardous Wastes.
 - (2) Non-Hazardous Wastes.
 - (3) PCB containing wastes.
 - (4) Asbestos containing wastes.
 - (5) Universal Waste Batteries
 - (6) Universal Waste Pesticides
 - (7) Universal Waste Thermostats.
 - (8) Containers of Free Liquids: Containers of liquids need to be identified as HWs or NHWs.
 - (9) Non-refillable compressed gas cylinders
 - (10) Compressed gas cylinders, unserviceable or rejected.
- b. Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center: Bldg 1209. The Following wastes are handled:
 - (1) Recyclables
 - (2) Municipal solid wastes.
 - (3) Household Hazardous Wastes.
 - (4) Universal Waste Lamps.
 - (5) Aerosol Cans.

- c. Fort Story Solid Waste, Recycling, and Pollution Prevention Center: Bldg 1053. The Following wastes are handled:
 - (1) Recyclables
 - (2) Municipal solid wastes.
 - (3) Household Hazardous Wastes.
 - (4) Universal Waste Lamps.
 - (5) Aerosol Cans.
- d. Antifreeze: Antifreeze requires mandatory recycling. Activities must keep records of their recycling efforts. Only antifreeze that is grossly contaminated will be accepted at the HWAF. This will be evaluated on a case-by-case basis. An antifreeze recycler SOP is available at ENRD.
- e. Aerosol Cans: All types of aerosol must be recycled. Aerosol cans must not be put into "Dumpsters" or mixed with Trash. Aerosol cans will not be stored with waste products in SASs or TSSs. These recyclable materials must be turned-in within 60 days of the date of initial accumulation or if the number of cans exceeds 50. Containers used to accumulate aerosol cans must be labeled as "Recyclable Materials". Cans being turned-in should be boxed or otherwise handled to prevent release of their contents. The CCL will be used as the turn-in document and does not have to be maintained during accumulation. The following line items on the CCL must be completed: 4, 7, and 20. Item 21 of the CCL should list each type of aerosol and quantity.
- f. Parts Washers (Aqueous and Solvent). This use of this equipment typically causes the generation of several different wastes, e.g., solvent, filters, waste water, sludge, used oil, etc.). All wastes generated must be identified and managed correctly as HW, NHW, or Used Oil. The Used Oil from the operation of the oil skimmer will be collected in containers. All containers will be closed when the skimmer is not in operation. The container will be labeled as "Used Oil". This Used Oil may be added to the activity's Used Oil tank or container. SOPs for aqueous and solvent parts washers are available from ENRD.

g. Contaminated Used Oil:

- (1) Used Oil that has been contaminated, usually with halogenated or non-halogenated solvents must be managed as a hazardous waste.
- (2) Containers or tanks that held contaminated used oil must be cleaned before being used to hold used oil. The residue from the clean out must be managed as HW. Activities should contact the HWAF for tanking cleaning procedures.

h. Filter Management:

- (1) Gasoline, Jet Fuel (all but JP8), Edge-Tek filters from Inland Technology Parts Washers, and any filter that has been contaminated with hazardous waste constituents must be managed as hazardous wastes.
- (2) Recovered non-hazardous liquids will be managed as used oil (separate oils from fuels), recyclable antifreeze, or non-hazardous wastes. Filters must be drained of all fluids and separated into groups as listed below:

- (a) Lube oil, transmission fluid, hydraulic fluid, Diesel fuel, jet fuel (JP8 Only), etc.
- (b) Antifreeze.
- (c) Air.
- (3) Any filter which has metal as part of its construction will be recycled.
- (a) Containers for filter recycling may be issued from the HWAF. HWAF issued containers may be delivered as part of normal operations.
 - (b) Containers not issued by the HWAF or SWCC need to be labeled as "Recyclable Materials".
 - (c) Containers of filters must **not** have any absorbents added.
 - (d) Containers must be turned-in when full. A CCL must be maintained for each container.
- (4) Filters which do not have any metal content will be containerized and turned-in IAW paragraph (5) below. Non-metal filters will be crushed to remove most of the remaining fluids and disposed of as NHW or non-hazardous solid waste.
 - (5) Filter turn-in procedures:
- (a) The CCL will be used as the turn-in document. The following line items on the CCL must be completed: 4, 7, and 20. Item 21 of the CCL should list each type of filter and quantity.
- (b) Containers of filters will be turned-in at the SWRPPC or scheduled for pickup by the HWAF along with other waste operations.

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Tab 1 Appendix H Instructions for Completing DD Form 1348-1A Disposal Turn-In Document (DTID)

H-1-1. General Requirements:

- a. The DD Form 1348-1A must be typed! Under adverse circumstances hand written documents with information clearly printed may be accepted if all copies are legible.
- b. All copies of the DD Form 1348-1A must be legible. If all copies are not legible, the materials will not be accepted.
- **H-1-2. Instructions:** ITEMS IN BOLD PRINT ARE TO BE COMPLETED BY THE ACTIVITY PRIOR TO TURN-IN! Specific blocks of the DD Form 1348-1A must be completed as follows:
 - a. Columns 23-24: Enter the appropriate unit of issue (container);
 - (1) "DR" = Drum
 - (2) "BX" = Box
 - (3) "CN" = Container
 - (4) "EA" = Each
- b. Columns 25-29: Enter the total number of containers being turned-in. Leading zeros must be entered. Example "00005"
- c. Columns 52-53: Should always be "21" standard code. (For all army units, other activities may need to use different code).
 - d. Column 71: Must contain "H".
 - e. Block 2 (Ship From): Enter "W26R1J".
 - f. Block 3 (Ship To): Enter "DRMO".
 - g. Block 4 (Mark For): Must contain "HW".
- h. Block 17 (Item Nomenclature): Enter "Common Name of material" (not DOT proper shipping name, hazard class, ID number, PG) or profile name and "EPA waste codes". Example "Paint, D001, D007, D008".
- i. Block 19 (No. Cont): Enter total "number of containers". This number should be the same as in item b above (Columns 25-29).
- j. Block 24 (Document Number & Suffix): Enter "W26R1J" in the upper left hand corner of the block. Enter the "first 4 digits of the stock number (FSC)" of the waste in the upper left hand corner of the block. Full NSN is for serviceable products only, not for wastes. The FSC for spill debris is "9999". Example:

W26R1J

8010

k. Block 26 (RIC, UI, QTY): Enter the following items with spacing as shown in the example, "PROFILE:" "HIN:" & "ASD:". Example:

PROFILE:

ASD:

1. Block 27 (Additional Information): Enter the following items with spacing as shown in the example, "Activity Document Number", "Activity Address", "Hazardous Waste Coordinator Information and signature", "Description of outside containers", "Site Number", "HWAF O/H:" & "Container Numbers".

Example:

"Signature"
John Q. Smith 2 - 55 gal 1A2

HWC 2 - 30 gal 1A2

878-1234 1 - 5 gal 1H2

Site Number: ET97001 HWAF O/H:

Container No. 00001, 00002, 00003, 00004, 00005

H-1-3. See Figure H-1-1 for an example of a completed DD Form 1348 - 1A.

Figure H-1-1 Example of a completed DD Form 1348 - 1A

2 A S	→ × CEO		CO	24 000U4 8 00F	-	F104#L K NO 8 -6 221	25 hA 5100-	26 RC (46) U1 (23/24) STY (25/24) CON CODE (74) CIST (55-56) UP (74-60)	DNAL DATA	27 4001
3 4	DR 00005	W26R1J	0108					PROFILE: HIN:	W26J4X - 6335 - 6th Trans Bn Fort Eustis, VA	Container No. C
SUPPLE: S F	E ADDRESS G N 21								23604	00001, 00002, 00003, 00004, 00005
5 6 7 8 9 0 1 6 P	HON COLUMN									00003, 00004,
A 66 66 78 86 96 96	20 E 020								ohn Q. WC 78-123	
UNIT PRICE	DOLLARS CTS	S DOCUATE 6 NI	10. QTY. RECO 11	16. FREIGHT CLA	17 ITEM HOMENCLATURE	Paint 18 TY CONT 19 A	22 RECEIVED BY		Smith	
DOLLARS		NIMFC	F 12	FREIGHT CLASSIFICATION NOMENCLATURE	CLATURE	<u>роот</u> ро				
CTS W26R	а манк	7 FRI RATE	UNIT WEIGHT	OMENCLATURE		20. TOTAL WEIGH		ASD:	1 2 2	
RLJ	IK FOA	8. TYPE CARGO	13 UNIT CUBE						55 gal 1A2 30 gal 1A2 5 gal 1H2	
DRMO		ARGO 9	14 UFC			21 TOTAL CUBE	23 DATE RECEIVED		10 10 10	
		io PS	15 51			H	CEIVE			

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Tab 2 Appendix H

Hazardous Waste Accumulation Facility (HWAF) Operations

- **H-2-1. General:** All Hazardous Waste (HW), Non-hazardous Waste (NHW), and Universal Wastes (UWs) excluding UW Lamps disposal must be coordinated through the HWAF.
 - a. The HWAFs at Fort Eustis and Fort Story are operated by DPW-ENRD.
- b. Activities will either turn-in wastes directly to the HWAF or coordinate shipments of wastes with the HWAF to include laboratory analysis, container numbering, material profiling, manifesting, Land Disposal Restriction (LDR) approval, etc.
 - c. The HWAF staffs are there to assist you, however they will not do your work for you.

H-2-2. General HWAF Operations:

- a. Location of HWAFs:
 - (1) Fort Eustis HWAF is located in Building 1208 and the office is in Building 1207.
 - (2) Fort Story HWAF is located in Building 1011.
- b. HWAF Hours of Operation:
 - (1) Fort Eustis: Monday through Friday from 0800 to 1500 hours.
 - (2) Fort Story: By appointment only, made through the Fort Eustis HWAF.
- (3) Hours of operation are subject to change without notice due to mission requirements. HWAFs are closed on all federal holidays and the Friday after Thanksgiving. If you cannot contact the HWAF and need an immediate answer, call DPW-ENRD.
- c. All scheduling of appointments must be made through the Fort Eustis HWAF, 878-3915 in writing, i.e., Fax, Email, etc. Appointments for services must be made at least the number of work days in advance as indicated below:
 - (1) Delivery of containers and pick up of wastes: 3 days
 - (2) Review and assistance with Waste Description Logs and Turn-in documents: 3 days
 - (3) Review of material profiles: 3 days
 - (4) Review of shipping documents, LDRs, and manifest signing: 5 days
 - (5) Approval of Laboratories, Transporters, and TSDFs: 30 days
- d. Activities will reimburse the installation for HWAF operational over head. This per pound rate will be determined by DPW-ENRD based on HWAF volume and operational costs.
- e. Large Quantity Generator (LQG) requirements must be met and all HWs must be disposed within the appropriate time limits.

- (1) Unique "one-time" waste generation from Activities which do not routinely generate HWs or NHWs must submit a memorandum to the DPW-ENRD stating why this is a unique event signed by the Commander or Director having AEC appointment authority. The Commander or Director will sign all documents in the absence of an AEC. This action cannot be delegated to subordinates.
- (2) Activities having SASs or TSSs which do not have an AEC or HWC must submit a memorandum to the DPW-ENRD stating addressing why an AEC and or HWC has not been appointed and trained signed by the Commander or Director having AEC appointment authority. The Commander or Director will sign all documents in the absence of an AEC. This action cannot be delegated to subordinates.

H-2-3. Generating Activities Utilizing the HWAF for Waste Turn-ins:

- a. Activities will reimburse HWAF for all containers and labels issued.
- (1) Activities will issue a requisition number (DODAAC+Julian date+ unique serial number) similar to the number used on the DD Form 1348-1A to the HWAF, which will be recorded on TCFE Form 6061 "HWAF Reimbursable Log" (Figure H-2-1). Activity personnel will sign the log for each line item for the containers received.
 - (2) This log will be closed by HWAF personnel periodically and submitted DRM for transfer of funds.
- (3) Activities that do not transfer funds within a reasonable time as determined by DRM, will be required to purchase containers from other sources. This will trigger "HazMat Employee" training requirements under DOT.
- (4) The HWAF will also issue a partially completed Container Contents Log (CCL) for each container. Items 1, 2, 4, 6, 8, 9, 10, 11, 12, 13, 14, 16, and 19 will normally be completed at this time by the HWAF.
- b. The HWAF will pickup containers of wastes from approved SASs and TSSs only. Activities without approved sites must schedule an appointment and deliver wastes to the HWAF.
- (1) All Activities must have a Waste Description Log approved for each waste prior to pickup. Activities should schedule an appointment to have their Waste Description Logs approved. Correctly completed CCLs (Appendix I TAB 1) and DD Form 1348-1As (TAB 1) must be completed prior to scheduling an appointment for pickup.
- (2) The HWC or AEC must contact the HWAF to schedule the appropriate appointment. Turn-in documents for waste pick-ups must be completed prior to scheduling an appointment.
 - (3) The HWC or AEC must be present during the scheduled pickup.
- (4) If the HWAF vehicle cannot get reasonably close to the TSS or SAS for container loading, then the activity will move accepted containers to the HWAF pickup vehicle.
- (5) HWCs or AECs which fail to keep a scheduled appointment will have to schedule and deliver the wastes to the HWAF. If this causes a violation of the site time limits, the appropriate Commander or Director will be notified.
- c. HWAF Inspections Prior to Receipt of Wastes: The HWAF staff will inspect all containers and conduct a site evaluation for compliance. Containers failing to meet all turn-in requirements will be rejected. TCFE Form 641 (Figure H-2-2) will be used.
 - (1) On-the-spot corrections for some administrative requirements may be possible.
- (2) Only AECs and HWCs can turn-in wastes. Trained Coordinators are the only personnel authorized to sign the turn-in documentation's certification (CCLs and DD Form 1348-1As). This is an automatic rejection.

- (3) Containers will be opened during the inspection. Activity personnel will assist during this process and must bring appropriate Personal Protection Equipment. At a minimum this will include eye protection and gloves.
- (4) All activities that have containers rejected for any reason, will receive a letter of rejection from DPW-ENRD. The first time an activity gets a rejection letter, it will go to the Battalion level Commander or Director. The second time an activity gets a rejection letter, it will go through the Garrison Commander to the Commander or Director. Activities receiving numerous on the spot corrections for a single turn-in or always requiring corrections over multiple turn-ins will get a letter from DPW-ENRD.
 - d. The HWAF operational overhead rate (HWAF O/H) will be applied to each DD Form 1348-1A

H-2-4. Generating Activities Not Utilizing the HWAF for Waste Turn-ins:

- a. Generating Activities may seek permission or be directed by DPW-ENRD to contract for laboratory, transportation, and disposal services for the following reasons:
- (1) The Activity has unique mission requirements that prevent utilization of DRMO contracts. This action requires DA approval.
 - (2) Waste disposal is not available from DRMO due to the type of waste.
 - (3) Contractors with project specific wastes that cannot be managed by DRMO.
- (4) Other circumstances, e.g., generating activity's mismanagement, which prevents utilization of DRMO contracts or may violate the 90-day accumulation limitation.
- b. In all cases, the generating activity assumes all generator and generating activity's liabilities, costs, and regulatory responsibilities for compliance and proper management. DPW-ENRD will impose significant limitations, management over site, and direction that will ensure installation compliance.
- (1) All generating activities contracting these services must have the contracts reviewed and approved by DPW-ENRD. Only DPW-ENRD approved transporters and TSDFs will be used. Activities will be required to fund transporter and TSDF audits contracted for or conducted by DPW-ENRD personnel as required. The HWAF O/H rate will be applied to each manifest or bill of laden based on total shipping weight using Page 2 of TCFE Form 6061.
 - (2) This requirement will be reviewed annually by DPW-ENRD for recurring requirements.
- (3) Activities signing materials profiles, LDRs, and manifests will have up to date copies of the following regulations and references as a minimum: 40 CFR 260 299, 49 CFR 100 177, Virginia Hazardous Waste Management Regulations, and the North American Emergency Response Guidebook.
 - c. Proper Waste Stream management must be accomplished:
- (1) Activities must have an approved Waste Description Log for each line item (waste stream) on HW manifests or non-hazardous waste manifests/bills of lading prior to issue of a manifest document number.
 - (2) Material profiles must be reviewed by the HWAF prior to shipment.
 - d. Personnel authorized to sign manifests or shipping documents:
- (1) Must have Advanced Environmental Management (AEM) and DOT "HazMat Employee" training IAW Appendix C.
 - (2) In addition, must have at least 6 hours of training on LDRs.

- (3) Obtain a manifest document number from the HWAF prior to each shipment and identify which items are to be shipped.
- (4) Each manifest must have 24-hour emergency response information. The installation does not provide this capability, therefore the activity must arrange for this service.
- (5) Manifest errors will be justification for the individual signing the manifest to be permanently removed from the authorized signature list and may incur other legal actions. Activities not having an authorized signature person will be required to schedule shipments with the HWAF in order to have the manifest signed.
- e. Correctly completed and certified Container Contents Logs (CCLs) must be delivered to the HWAF along with the signed legible copies of manifests, TSDF material profiles, analytical data, and LDRs within 2 working days of each shipment.

Figure H-2-1 Example of a TCFE Form 6061 page 1

Activ	rity:				
Activ	rity Requistion N	lumber:	-		
Activ	rity Point of Con	tact:			
Activ	rity Phone Numb	er:	Authorized	I Site Number:	
Date of Issue	Quantity	Description	Item Cost	Extended Cost	Received By
					ESTATIVE
OTALS	190000				
ssued By F				Date	
essegress. Com	1000000 1 0				

Example of a TCFE Form 6061 page 2

Activity:			
Activity En	wironmental Coordina	tor:	
Activity Ph	one Number:	Authorized Site Number:	
Manifest	Manifest	Designated Treatment, Storage or	Total Manifest
Number	Date	Disposal Facility (TSDF)	Weight (Pound
		TOTAL MANIFEST WEIGHT (pounds)	
		HWAF O/H RATE (dollars/pound) TOTAL COST	
8	Activity Enviro	Date	
		Date	

Figure H-2-2 Example of a TCFE Form 641

HWAF SITE PICKUP INSPECTION CHECK LIST Generating Activity: Building Number: HWC: Telephone: Authorized Site No. Conformation No: CHECK LIST ITEMS NO YES Corrected 1 Does area have all required signs? 2 Does area have Emergency Notification Instructions posted? 3 Does site have copy of Contingency Plan posted? 4 Does site have Compatability Chart? 5 Is communication equipment (telephone, radio, etc) available and operational? 6 Are fire extinguishers available? Charged? Seals intact? 7 Is a spill kit available and serviceable? 8 Does site have adequate aisle space? 9 Are wastes stored with adequate containment? Sheltered from environment? 10 Are Weekly Accumulation Site Inspections being completed? 11 Are the containers DOT approved? 12 Are the containers serviceable? (Free of dents, rust, leaks, etc.) 13 Are bungs/rings secured? Are containers tightly closed? 14 Are containers properly labeled as required? (HW, UW, NHW, DOT, Empty, etc) 15 Is accumulation start date on HW and UW labels as required? 16 Does container have unique container number? 17 Are the containers compatible with the stored materials? 18 Are incompatible wastes separated from other wastes? 19 Are wastes separated from serviceable materials? 20 Are HWC and AEC trained? 21 Is the HWC or AEC present for the scheduled turn-in? 22 Is a Container Contents Log present & complete for each container? 23 Is a written description (TCFE 646) present for all wastes being Turned-in? 24 Are Turn-in documents complete and ready at scheduled appointment? 25 Is the 1348 typed - all copies readable? Is the 1348 Correct? 26 Are HWs being turned-in within 14 days at a TSS? 27 Are HWs being turned-in within 3 days at a SAS? 28 Are UWs being turned-in within 270 days? COMMENTS: SIGNATURE OF HWAF REPRESENTATIVE: DATE:

TCFE Form 641 - DPW

Mar 03 (Previous Edition is Obsolete)

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Appendix I

Container Management

I-1. Purpose. This appendix establishes the requirements for the management of containers, e.g., Abandoned, Empty, Hazardous Materials, Hazardous Wastes, Non Hazardous Wastes, Universal Wastes, USED OIL, Recyclable Materials, Large Containers, etc.

I-2. General:

- a. All containers must be properly labeled at all times. This includes serviceable materials, wastes, recyclable materials, and empty containers.
 - (1) Labels and markings must be replaced if they become damaged or lost.
- (2) Labels have to remain on containers until they are sufficiently cleaned of residues and purged of vapors to remove any potential hazards.
- (3) Labels and markings no longer applicable to the contents will be removed, defaced to make them unreadable, or painted over.
- (4) Containers will be stored in such a manner that allows for easy access to container labels. Under no circumstances should containers have to be moved in order to read any label or opened to determined container contents.
 - b. Container usage and storage:
- (1) If a container holding materials or wastes is not in good condition (signs of bulges, damage, or corrosion, etc) or begins to leak, the contents will be transferred to an approved serviceable container immediately.
- (2) A container shall always be closed during storage except when it is necessary to add or remove materials or wastes.
- (3) A container shall not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
 - (4) Incompatible materials or wastes will not be placed in the same container.
- (5) A copy of the "Incompatible Materials" chart will be available at each site-specific HMs storage or accumulation site (TSS or SAS). Copies are available at Post Safety, Fire & Emergency Services, or HWAF.
 - (6) Containers must be compatible with the materials or wastes being contained.
- (7) Containers will not be reused for other purposes until the residues and hazards associated with the previously held materials or wastes are removed.
- (8) Containers of materials or wastes which are incompatible with other containers of materials or wastes stored nearby will be separated or protected from the incompatible materials or wastes by means of a dike, berm, wall, or other device to prevent the mixing of incompatible materials if contents leak or are spilled.
- (9) Containers must be kept on pallets if not using containment pallets or "HazMat Storage Buildings" with containment. Containers must be protected from the environment (rain, snow, etc.).

- (10) Container storage areas must have sufficient containment to prevent releases to the environment from an undiscovered leak from the largest container.
- (11) All material or waste storage areas will have adequate aisle space. Adequate aisle space will allow the unobstructed movement of fire protection; spill control, decontamination equipment and personnel in case of an emergency to the problem container(s) within a storage area.
- (12) Serviceable products will not be stored with wastes. Wastes must be physically separated from other materials, e.g., chains or ropes with signs, fences, walls, etc.
- **I-3. Management of Unknown or Abandoned Containers:** ALL UNKNOWN OR ABANDONED CONTAINERS SHOULD BE HANDLED WITH CAUTION! DO NOT ASSUME THAT A LABEL ACCURATELY REFLECTS CONTENTS!
- a. Immediately, upon discovery or someone reporting an unknown or abandoned container, accomplish the following:
 - (1) If container is leaking, call 911.
 - (2) If the container is not leaking;
 - (a) Try to identify the contents from markings, labels, etc. Note date, time, and location.
- (b) Try to identify the owner of the container(s) from area of responsibility, questioning personnel in the surrounding area, etc.
- (3) If ownership can be determined, ensure appropriate personnel are notified and the container is properly managed.
- (4) If ownership can not be determined, notify the Military Police (MPs), who will investigate to determine the owner of the container. The MPs will provide DPW-ENRD with a copy of their findings.
- b. Containers not acted upon immediately (with 24 hrs) will become the property of the activity where the container is located.
 - c. DPW-ENRD will provide additional instructions and assistance on a case-by-case basis as required.
 - d. The reporting activity will be responsible for assisting HWAF personnel until the container is picked-up.

I-4. Empty Containers:

- a. Containers may not be reused for other purposes or disposed until empty. RCRA empty containers are not managed as hazardous wastes, however, previously used containers must be:
- (1) Sufficiently cleaned of residues and purged of vapors to remove any potential hazards before being classified empty.
 - (2) Previous labels have to remain on containers until empty.
 - (3) Previous labels must be removed, defaced, or painted over once the container is empty.
- b. Empty containers must be labeled individually as "empty" unless the container storage area is clearly designated as a "storage area for empty containers".

c. Containers designated for spills will be labeled "EMPTY" and "FOR SPILL USE ONLY".

I-5. Containers of Hazardous Materials:

- a. Containers of hazardous materials not properly labeled should not be accepted by the requisitioning activity.
- b. Labels must conform to OSHA, DOT, and Post Safety standards as required. The Post Safety Office can provide information on proper labeling requirements.
- c. The trade name on the label should match the trade name on the Material Safety Data Sheet (MSDS). If you do not have a MSDS for the product, request one from the HazMart or the supplying organization when you order the HMs.
- d. HM will be stored in well-ventilated areas. Temperature sensitive materials will be stored to prevent exposure to temperature extremes.

I-6. Containers of Hazardous Wastes (HWs) and Non Hazardous Wastes (NHWs):

- a. Only DOT approved containers will be used for waste accumulation. DOT approved containers must be marked with United Nations markings.
- b. Containers holding ignitable or reactive wastes shall be located at least 50 feet within the installation's property line.
 - c. Acquisition of containers and labels:
- (1) For activities that use the HWAF for turn-ins, the HWAF will provide pre-labeled containers for wastes and "Empty" containers for spills to activities with approved TSSs or SASs on a reimbursable basis. The HWAF will also issue a partially completed Container Contents Log (CCL) for each container. See TAB 1.
- (2) Activities that do not use the HWAF for waste turn-ins, the activity is responsible for all acquisition and "HazMat Employee" training requirements under DOT.
- d. A CCL must be kept for each container of HWs and NHWs. The HWAF will issue all container numbers, which must match the container number on the container label.
 - e. Hazardous waste labeling:
 - (1) Containers of HW must have a HW label (correctly completed): The following information is required:
 - (a) DOT Proper shipping name.
 - (b) DOT ID Number.
 - (c) Name and address of the installation (See Appendix H).
 - (d) EPA ID Number (See Appendix H).
 - (e) EPA Hazardous Waste Codes.
 - (f) Accumulation start date (ASD) entered as required by TSS or SAS personnel.
 - $(g) \ \ Container \ number \ from \ the \ CCL \ should \ be \ written \ in \ the \ upper \ left \ hand \ corner \ of \ the \ HW \ label.$

- (h) Manifest document number entered at time of shipment.
- (i) DOT Hazard Class.
- (j) DOT packaging group.
- (2) DOT hazard class labels meeting DOT labeling requirements must be on each HW container (EPA and DOT labels must be within 6 inches of each other).
 - f. Non-Hazardous Waste labeling:
- (1) Containers of non-hazardous wastes should be labeled with a non-hazardous waste label, correctly completed.
- (2) The contents of the container must be adequately described. If the NHW is DOT regulated, all DOT shipping information must be entered and the appropriate DOT hazard class labels applied within 6 inches of the NHW label.
 - (3) Container number from the CCL should be written in the upper left hand corner of the NHW label.
- (4) "Non regulated" labels should be avoided. The words "non-regulated" are often misleading. This label only means that this material is not regulated as a hazardous waste.
- g. Activities will certify the contents of each container of waste are accurately listed on each CCL. The AEC and or the HWC will make this certification. When the activity does not have an AEC, the commander or director having appointing authority for the AEC will sign the CCL.
 - h. The Container Turn-in Log (CTL):
- (1) Activities are required to maintain a calendar year CTL (Figure I -1) for each waste site. A CTL must be maintained and kept with the Activity's completed copy of the DD Form 1348-1As for each site.
- (2) Most of the items on the CTL come directly from the CCL and DD Form 1348-1A and are self- explanatory. The following items may need clarification:
- (a) Date of turn-in: This date must match the date the material was received by the HWAF or manifested (if other disposal options are used).
 - (b) Person turning-in: This should be the AEC or HWC.

I-7. Containers of Universal Wastes (UWs):

- a. All containers of UWs must have a label indicating the type of UW, e.g., UW Lamps, UW Batteries, UW Pesticides, UW Thermostats.
 - b. All containers of UW must have the Accumulation Start Date marked on the label.
 - c. Some UWs will be required to have a DOT label.
 - d. All UWs excluding UW Lamps must be in DOT approved containers.
 - e. All UWs excluding UW Lamps will have a CCL.

- f. Turn-ins of all UWs excluding UW Lamps will be recorded on the CTL.
- g. Containers of UW Lamps will be closed in such a manner so that potentially broken lamp debris cannot be released from the container.
 - h. UW Lamps cannot be stored in the same container with serviceable lamps.
 - i. Broken lamps must be handled as UWs.

I-8. Packaging of Hazardous Wastes (HWs) and Non Hazardous Wastes (NHWs):

- a. Packaging may affect the disposal costs and options available for a specific waste stream.
- b. Do not mix waste streams in the same container.
- c. The following rules for packaging must be followed for turn-ins at the HWAFs or the waste will be rejected:
 - (1) Do not place free liquids in containers not approved for liquids, generally open-top type containers.
- (2) Do not mix containers less than 5-gallon in capacity with containers that are equal to or larger than a 5-gallon in the same over pack container.
 - (3) Do not mix aerosol cans with any other containers in an over pack container.
 - (4) Do not mix solids and liquids in the same over pack container.

I-9. Containers or Tanks of "USED OIL":

- a. Containers or tanks for used oil must be marked "USED OIL" not "Waste Oil".
- b. Containers or tanks must be secured or locked to prevent contamination from unknown sources.
- c. Areas around "USED OIL" containers or tanks must be free of any signs of contamination.
- d. Containers of "USED OIL" should not be stored in TSSs or SASs.

I-10. Containers for Recyclable Materials:

- a. Containers of Recyclable Materials should be marked to indicate the commodity type, e.g., white paper, news paper, plastic, etc. These commodities need to be sourced separated.
- b. Containers used to stored aerosol cans waiting to be recycled must be labeled "Recyclable Materials Aerosol Cans". Never used the word "waste". These containers cannot hold other materials or trash.
- c. Containers used to stored antifreeze waiting to be recycled must be labeled "Recyclable Antifreeze". Never used the word "waste".

I-11. Large Containers:

- a. Large Containers are defined as shipping containers, connex boxes, Milvans, "HazMat storage buildings", office or storage type trailers, trailers when separated from their tractors, etc.
 - b. All large containers on the installation for more than 24 hours will have the following signs or labels:
 - (1) Name of owner or local organization.

- (2) Address of owner or local organization.
- (3) Individual name or point of contact of owner or local organization.
- (4) Telephone number of owner or local organization.
- c. Large containers used to store hazardous materials or wastes will be labeled or have the appropriate signs designating the type storage.
- d. Immediately, upon discovery or someone reporting an "unknown or abandoned" container, the following must be accomplished:
 - (1) If container is leaking, call 911.
 - (2) If the container is not leaking;
 - (a) Try to identify the contents from markings, labels, etc. Note date, time, and location.
- (b) Try to identify the owner of the container(s) from area of responsibility, questioning personnel in the surrounding area, etc.
 - (1) If ownership can be determined, ensure appropriate personnel are notified.
- (2) If ownership cannot be determined, notify the Military Police (MPs), who will investigate to determine the owner of the container. The MPs will provide DPW-ENRD with a copy of their findings.
 - (a) If ownership can be determined, ensure appropriate personnel are notified.
 - (b) If ownership cannot be determined, then the MPs will handle the container as abandon property.
 - e. The owner will be liable for all costs associated with such investigations and disposal.

Figure I-1 Example of a TCFE Form 644

Generating Activity:	ı,			Buildi	Building Number:				
Date of Turnin	Container	ASD for	Common Name or Description	Qua	Quantity ode Collone	AUT	Cost	WHM	Name of Person
									Account to Account
6									
				1 10 10					
		Œ.							

TCFE Form 644 Mar 03 (Previous Edition is Obsolete)

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Tab 1 Appendix I Instructions for Completing Container Contents Log

I-1-1. Container Contents Log (CCL), TCFE Form 645:

- a. Each container of Hazardous Waste (HW), Non-Hazardous Waste (NHW) or universal waste (UW), excluding UW Lamps must have a CCL maintained during accumulation or storage.
 - b. The original CCL must be turned-in at the Hazardous Waste Accumulation Facility (HWAF):
- (1) The activity turning wastes in at the HWAF will submit the completed CCL along with the DD Form 1348-1A.
- (2) Activities not using the HWAF for waste turn-ins using will submit the CCL to the HWAF within 3 days of the shipment along with the other required documents.
- c. The HWC or AEC will record required information on the Container Turn-in Log (CTL) from the CCL during the turn-in or shipping process. Activities do not have to keep a copy of the CCL once the waste is turned-in.

I-1-2. ITEMS IN BOLD PRINT ARE TO BE COMPLETED BY THE ACTIVITY PRIOR TO TURN-IN!

NOTE: ITEMS 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 16, & 19 **MUST BE COMPLETED BEFORE OR WHEN WASTES ARE FIRST ADDED.**

- a. Specific blocks of the CCL must be completed as follows:
- (1) Container Number: Issued by the HWAF only. **Activities not using the HWAF for waste turn-ins must obtain number from HWAF and enter number.**
- (2) Profile Number: Issued by the HWAF only. Activities not using the HWAF for waste turn-ins must obtain number from HWAF and enter number.
 - (3) HWAF Doc Reg. No: Entered by HWAF.
- **(4) Generating Activity:** Enter the "Higher HQ & Battalion & Company" or "Directorate & Division" as applicable.
 - (5) **Building Number:** Enter building number of the HW site.
- **(6) Authorized Site Number:** This number is issued by DPW-ENRD as part of the site approval process. **This is a must have number!**
 - (7) **Phone Number:** Enter Activity HWCs phone number.
- (8) DOT Proper Shipping Name: Entered or supplied by the HWAF. This is related to the profile number (Hazardous Material Table 49 CFR 172-173). Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF prior to shipment.
- (9) DOT Hazard Class: Entered or supplied by the HWAF. This is related to the profile number (Hazardous Material Table- 49 CFR 172-173). Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF prior to shipment.

- (10) DOT ID Number: Entered or supplied by the HWAF. This is related to the profile number (Hazardous Material Table- 49 CFR 172-173). Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF prior to shipment.
- (11) DOT Packaging Group: Entered or supplied by the HWAF. This is related to the profile number (Hazardous Material Table 49 CFR 172-173). Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF prior to shipment.
 - (12) Type DOT Container: Enter the United Nations "UN" markings.
 - (13) Size/Volume: Enter the size or volume of the container.
- (14) Waste Description: Entered or supplied by the HWAF. This is the profile name listed with the profile number. Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF when waste is first added.
- (15) Accumulation Start Date: This is the first day that waste is added to a container in a TSS or when the volume reaches 55 gallons of HW or 1 quart of acutely hazardous waste accumulated in a SAS.
- (16) EPA Waste Codes: Entered or supplied by the HWAF. This is related to the profile number. **Activities** not using the HWAF for waste turn-ins must verify this information with the HWAF when waste is first added.
- (17) Origin code: Entered by the HWAF during in processing at the HWAF. Activities not using the HWAF for waste turn-ins must verify this information with the HWAF prior to shipment and enter information.
- (18) Source Code: Entered by the HWAF during in processing at the HWAF. **Activities not using the HWAF** for waste turn-ins must verify this information with the HWAF prior to shipment and enter information.
- (19) Form Code: Entered by the HWAF. This is related to the profile number. Activities not using the HWAF for waste turn-ins must verify this information with the HWAF when waste is first added.
 - (20) Date of Activity: Each time waste is added to or removed from the container, an entry must be made.
- (21) Type of Waste: A general description of the waste must be shown, e.g. fuel filters, waste oil, waste paint, etc. This is not the profile name listed in item 14!
- (22) Process generating waste: How was the waste derived, e.g., vehicle maintenance, painting, spill clean-up etc. This must match the written description of the waste.
- (23) Name of person adding or removing waste: The person adding waste to the container must be entered. This should be done under the supervision of the HWC or HWS.
 - (24) Weight: Each time waste is added, estimate the weight in pounds or;
 - (25) **Volume:** Each time waste is added, estimate the volume in gallons.
 - (26) Comments: Used by the activity or HWAF to record any additional information needed.
- (27) Subtotal of additional sheets: If more than one CCL sheet is needed to record waste accumulation, attach additional sheets and add the total here.
 - (28) Container Total: Add the amounts in either the "pounds" or "gallons" column.
- (29) Actual Weight by HWAF or SWCC: Containers turned-in to the HWAF or SWCC will be weighed by the HWAF or SWCC.

- (30) HWC Certification: The HWC must sign the certification that the contents are true and accurate when ready for disposal.
- (31) AEC Certification: The AEC must sign the certification that the contents are true and accurate when ready for disposal. The AEC may sign in lieu of the HWC, if a HWC is not available. If the AEC is not available or not trained in HWM, the Commander or Director having signature authority for appointing the AEC must sign for the AEC. This cannot be delegated to other personnel.
- b. Figure I-1-1 is an example of a CCL as it is prepared by the HWAF and delivered to the Activity along with a properly labeled container. It is the Activity's responsibility to ensure that the labeled container and CCL match for contents and container number and ir for the requested waste. Once on site it's the Activity's liability.
- c. Questions concerning the completion of this form should be directed to the HWAF. Any mistakes need to be brought to the attention of the HWAF ASAP!

Example of a TCFE Form 645

1. Container No:	E200360		2. Profile No: 0295	3. HWAF Dac. Reg. No:		000000000000000000000000000000000000000
4. Generaling Activity :	7 Gp	HHC	3rd Port	5. Building No:	438	TSS
6. Authorized Site No:	ET99002	DODAAC: W26AKG	7. Phone	7. Phone Number of HWC	SSG Doe	878-3898
8. DOT Proper SHipping Name :		Waste Paint				
9. DOT Hazard Class:	8		10, DOT ID No : UN1263	11. Packaging Group:	=	RQ: 10 lbs
12, DOT Container Type :	1A1		13. Size or Volume:	55		
EPA REQUIRED INFO:		14. Waste Description : Pair	14. Waste Description: Paint , Ignitable w/ Lead, Chromlum, MEK	¥		
15. ASD:		16. EPA Waste Codes : D001 D007 D008 D035	1 D007 D008 D035			
17. Origin Code: 1		18. Source Code: G11	-6-1	19. Form Code: W209		
					ESTI	ATED QUAR
20. Date of Activity	21. Type (De	21. Type of Waste (Description of Contents)	22. Process Generating Wasto	23. Name of Person Adding Waste	24. Pounds	ds 25. Gallens
			The second secon			130
			Ħ			
26. Comments :				27. Subtotal of Additional Sheets	sets	
				Z8. ACTUAL WEIGHT BY HWAF:	VAF:	
Loartify that the contents of MWC:	of this confainer h	ave been fully and accurately describ	Centry that the contains of this container have been fully and accurately described above and isted IAW at applicable foderal, state, and local rules and regulations 50. Mane of HWC;	ral, state, and local rules and regulal	lions.	
31. Name of AEC:	The state of the s		Signature :	Three street, and the street,	Date	

Appendix J

Inspections

J-1. Purpose. This appendix establishes the inspection requirements for installation activities.

J-2. General.

- a. Inspections. Inspectors are not required to give prior notice. Access to all Hazardous Materials (HMs) storage areas, Universal Waste storage areas, and Hazardous Waste (HW) accumulation sites must be available at all times.
- b. Federal and State inspectors may inspect Fort Eustis or Fort Story at any time. If a Federal or State inspector arrives for inspection, do not delay the inspector; however notify DPW-ENRD as soon as possible.
- c. Activities will make corrections on the spot or take immediate action to correct efficiencies noted during the inspection.

J-3. Inspection Scheduling or Frequency.

- a. Inspections from Federal, State, and other agencies external to the installation may be scheduled or unannounced and occur periodically at the discretion of the inspecting agency. Typically the VDEQ conducts HW inspections of each installation on an annual basis.
- b. Activities will ensure that the following inspections are conducted and will maintain an inspection log to track the various inspections:
- (1) At least quarterly inspections of their HMs & UW storage areas; motor pools; Solid Waste collection areas; Recycling Areas, and HW accumulation sites using the checklist at TAB 1. The AEC will normally be the individual conducting these inspections. The Activity will be re-inspected by the AEC within 30 days of any inspection or re-inspection that shows one or more deficiencies. A memorandum for record (MFR) signed by the Commander or Director having appointing authority for the AEC will be attached to each re-inspection citing the deficiencies, corrective actions taken, and how this will be prevented in the future.
- (2) At least weekly (within 7 calendar days) inspections of SASs and TSSs by the AEC, HWC, or HWS using the inspection checklist, Figure K-4.
- (3) At least monthly (within 30 calendar days) inspections of each Hazardous Material storage areas by the AEC, HWC, or HWS using the inspection checklist, Figure K-1, Side 1.
- (4) At least monthly (within 30 calendar days) inspections of each Universal Waste Site by the AEC, HWC, HWS, HWH, or UWH using the inspection checklist, Figure K-1, Side 2.
 - c. DPW-ENRD will inspect generating activities periodically.
- (1) The inspection checklist at TAB 1 will be used. The inspection criteria are referenced back to specific paragraphs in this Regulation unless otherwise specified. A copy of the inspection results will be given to the activity at the end of the inspection. A second copy will be given to the Activity Environmental Coordinator (AEC). If major (training, storage, or accumulation start date deficiencies) or numerous deficiencies (five or more) are noted, the second copy will be sent through the Garrison Commander to the Commander or Director. Inspection records will be kept for 3 calendar years from date of inspection.

- (2) Activities will send a memorandum to DPW-ENRD through their Commanders or Directors within 30 days of the date of inspection specifying the steps taken or planned to correct all deficiencies. If this memorandum is not received by DPW-ENRD within 30 calendar days, a memorandum will be sent through the Garrison Commander to the Commander or Director.
- d. HWAF Inspections Prior to Receipt of Wastes: The HWAF staff will inspect all containers and conduct a site evaluation for compliance. Containers failing to meet all turn-in requirements will be rejected.
 - (1) On-the-spot corrections for some administrative requirements may be possible.
- (2) Only AECs and HWCs can turn-in HWs and NHWs. Trained Coordinators are the only personnel authorized to sign the turn-in documentation's certification (CCLs and DD Form 1348-1As). This is an automatic rejection.
- (3) Containers will be opened during the inspection. Activity personnel will assist during this process and must bring appropriate Personal Protection Equipment. At a minimum this will include eye protection and gloves.
- (4) All activities that have containers rejected for any reason, will receive a letter of rejection from DPW-ENRD. The first time an activity gets a rejection letter, it will go to the Battalion level Commander or Director. The second time an activity gets a rejection letter, it will go through the Garrison Commander to the Commander or Director. Activities receiving numerous on the spot corrections for a single turn-in or always requiring corrections over multiple turn-ins will get a letter from DPW-ENRD.

Tab 1 Appendix J Activity Multi-Media Environmental Management Inspection Checklist

1. Activity Inspected: -			
2. Inspection Date:	Location	a:	
3. Inspection Type: Announced	Unannounced	Re-inspection	Courtesy
4. Inspected by:			
5. Activity Coordinators (Trained and Ap	ppointed):	Name	YES NO
a. Activity Environmental Coordinator	r (AEC): (para 2-9 a(1))		
b. Alternate AEC: (para 2-9 a(1))			
6. Does the Commander, Director, or AE	C conduct quarterly inspe	ctions? (para J-3b(1))	
7. Dates of last 4 quarterly inspections/re	-inspections: a	b c	d
8. Number of deficiencies noted on above	ve inspections: a	b c	d
deficiencies): a No deficiencies were noted. b Deficiencies were noted. D on the spot corrections or take immediate	etailed inspection results a		
c. Date Memorandum due to DPW-Ei memo to ENRD, DPW through their Conspecifying the steps taken to correct all days, a memo will be sent through the Gard. Activity will be re-inspected on	NRD: nmander or Director with deficiencies. If this memorison Commander to the C	For all external inspection in 30 calendar days of the pois not received by ENRD.	ns, Activities will send a
10. Inspector's Comments:			

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11. Report received by:		
	Signature	
		
 Title	Date	Telephone

Hazardous Materials Management Inspection

1. Hazardous Material Management (HMM):	YES	NO	NA
a. Have all HMHs/Users received HazCom training? (para C-5a(1) (a))			
b. Have all HMHs/Users received First Responder Awareness Level training? (para C-5a (1)(b))			
c. Does the Activity have an accurate and up to date Authorized Use List? (para G-5b(2))			
d. Does the Activity acquire all HMs from the HazMart? (para G-5b(1))			
e. Does the Activity submit the Quarterly Hazardous Material Inventory Report on time including a compressed gas cylinder inventory if needed? (para G-10a and para G-Tab 1-5)			
f. Does the Activity submit the Munitions Expenditure Report and/or The Transient Aircraft/Vehicle Refueling Report on time? (para G-Tab 1-b&c)			
2. Hazardous Materials Storage Area (Location Building No):			
a. HM sites:			
(1) Is a Material Safety Data Sheet (MSDS) available for each hazardous material stored and used by the activity? (para K-3b)			
(2) Does site have a copy of the Contingency Plan on-site? (para K-2e)			
(3) Does the Activity inspect its HMs storage areas monthly? (para K-3a)			
(4) Does site have sign indicating HM storage area? (para K-2c(1))			
(5) Does site have "No Smoking" sign? (para K-2c(2))			
(6) Does site have "Unauthorized Personnel Keep Out"? (para K-2c(3))			
(7) Does site have emergency response information posted? (para K-2d)			
(8) Does site have portable fire extinguishers? (para K-2b(3))			
(9) Does site have an appropriate spill kit for the type(s) of materials? (para K-2b(4))			
(10) Does site have adequate aisle space to allow the unobstructed movement of fire, spill control, and personnel in an emergency? (para I-2b(11))			
(11) Are telephones, two-way radios, or similar alarm devices located near the site? (para K-2b(2))			
(12) Does site have containment in sufficient capacity to hold the largest volume of an undetected leak to prevent a HM discharge? (para K-2a(2))			

(13) Does site prevent the collection of rainwater? (para K-2a(3))			
	YES	NO	NA
(14) Are hazardous materials segregated from wastes? (para I-2b(12))			
(15) HMs have been stored and used in such a manner as to prevent any spills or releases at this site as evidence by contaminated media or soil needing sampling or clean up. (para K-2a(1))			
b. HM Containers and Labels:			
(1) Do storage containers have original manufacturer labels and are these labels legible? (para I-2a(2))			
(2) Are materials stored together according to appropriate chemical compatibility? (para I-2b(4))			
(3) Are materials compatible with storage containers? (para I-2b(6))			
(4) Are containers being kept on pallets? (para I-2b(9))			
(5) Are containers in good condition, i.e., no signs of bulges, leaks, or corrosion? (para I-2b(1))			
(6) Are containers compatibly stored, i.e., flammable HM are separated from reactive wastes,, strong acids and bases are separated, etc? (para I-2b(5)&(8))			
(7) Are containers kept tightly closed during storage? (para I-2b(2))			
(8) Are all empty containers labeled as "empty"? (para I-4b)			
(9) Are temperature-sensitive materials stored to prevent exposure to temperature extremes? (para I-5d)			
(10) Are hazardous materials stored in a storage area, which is adequately ventilated? (para I-5d)			
(11) All containers are correctly labeled (No unlabeled, abandoned drums, or other containers in the area)? (para I-2a)			
Inspectors Comments:			

Hazardous Waste Management Inspection

(Complete a separate form for each TSS or SAS)

Authorized Site Number:	Location Building N	Vo.:		
Site is classified as a (check one): Satellite Accumulation	on Site (SAS)	Temporary S	torage Si	te (TSS)
1. Hazardous Waste Management (HWM):				
a. Training:		YES	NO	NA
(1) Hazardous Waste Coordinator (HWC): (para 2-a(3)	ı)			
(2) Alternate HWC: (para 2-a(3))				
(3) Have all Hazardous Waste Supervisors (HWSs) and Handlers (HWHs) received HazCom training? (para C-5a(1)(a))				
(4) Have all HWSs and HWHs received First Responde Initial or Annual Refresher training? (para C-5a(1)(b))	er Awareness			
(5) Have all HWSs and HWHs received Basic Environmental or Annual Refresher training? (para C-5b)	nental Management (l	BEM)		
(6) Have all HWSs received Intermediate Environmenta Initial or Annual Refresher training? (para C-5b)	ıl Management (IEM)			
(7) Does Activity have an up to date Environmental Ma on file, which includes documentation of initial and refresher t (para C-6c)	_			
(8) Are Environmental Management training records keindividuals leave the activity? (para C-6c)	ept for three years after	er 		
(9) Are copies of BEM & IEM answer sheets available	for review? (para C-60	c(3))		
(10) Does Activity maintain a list of job titles and job de who handle or directly supervise those who handle hazardous				
b. General HWM:				
(1) Is the site approved using TCFE Form 199? (para K-Approval Date:	-4 c)			
(2) Does Activity have an up to date site specific HW Plan? (para K-2 e) HWCP Date:				
(3) Is a Waste Description Log (WDL) for each waste s (TCFE From 646)? (para K-4 (b))	tream available			
(4) Does Activity maintain MSDSs, product specificate waste stream? (para K-4(b))	ions, or analyses for e	each		

(5) Does Activity maintain a Container Turn-in Log (CTL) for each	YES	NO	NA
calendar year? (para I-6 h(1))			
(6) Does Activity maintain a Container Contents Logs (CCL) for each container of waste? (para I-6 d)			
(7) Are copies of turn-in documents (DD Form 1348-1A) on file at the activity? (para I-6 h (1))			
(8) Is the site inspected on a weekly basis? (para K-4d)			
(9) Does Activity maintain copies of all HWM records for 3 years? (para 2-7 j)			
c. ALL Accumulation Sites:			
(1) Does site have sign indicating type of storage area.? (para K-2c(1))			
(2) Does site have "NO SMOKING" sign? (para K-2c(2))			
(3) Does site have "Unauthorized Personnel Keep Out" sign? (para K-2c(3))			
(4) Does site have emergency response information posted? (para K-2d)			
(5) Does site have portable fire extinguishers? (para K-2b(3))			
(6) Does site have a spill kit? (para K-2b(4))			
(7) Does site have adequate aisle space to allow the unobstructed movement of fire spill control, and personnel in an emergency? (para I-2b(11))	e, 		
(8) Are telephones, two-way radios, or similar alarm devices located near the site? (para K-2b(2))			
(9) Is a water supply adequate for fire protection available nearby? (para K-2b(5))			
(10) Does site have containment in sufficient capacity to hold the largest volume of an undetected leak to prevent a HW discharge? (para K-2a(2))			
(11) Is the site protected from the elements? (para K-2a(3)			
(12) Are containers being kept on pallets? (para I-2b(9))			
(13) Are containers in good condition, i.e., no signs of bulges, leaks, or corrosion? (para I-2b(1))			
(14) Are only DOT approved containers being used to store wastes? (para I-6a)			
(15) Are containers compatible with the waste stored in them? (para I-2b(6)			

	YES	NO	NA
(16) Are containers compatibly stored, i.e., ignitable wastes are separated from reactive wastes, strong acids and bases are separated, etc? (para I-2b(8)			
(17) Does site have "Compatibility" chart? (para K-2i))			
(18) Are containers kept tightly closed during storage? (para K-2b(2))			
(19) Are wastes being stored separately from serviceable materials? (para I-2b(12))			
(20) Are all containers of waste materials correctly labeled as HWs or NHWs? (para I-2a)			
(21) Are all empty containers labeled as "empty"? (para G-4b)			
e. For SASs Only:			
(1) Is the site located at or near the point of generation, where waste initially accumulates and is under the control of the operator of the process generating the waste? (para K-7a)			
(2) If more than 55 gallons of any type of hazardous waste or one quart of acutely last been accumulated, an accumulation start date has been marked on the labels of all full containers of that type of waste? (para K-7 b & c)	HW		
(3) Full 55 gallon drums of any type of hazardous waste are held for less than three days before being turned into a TSS? (para K-7c)			
f. For TSSs Only:			
(1) Are accumulation start dates marked on the labels of all hazardous waste containers? (para K-6d)			
(2) Are containers kept on-site for less than 14 days after the Accumulation Start Date? (para K-6e)			
g. Activities that ship independently of the HWAF:			
(1) Personnel signing manifests are DOT HazMat Employee Trained? (para H-2-4 d(1))			
(2) Personnel have at least 6 hrs of LDR training? (para H-2-4.d.(2))			
(3) Personnel signing manifest have been authorized by DPW-ENRD? (para 2-7b)			
(4) Does Activity have up to date copy of 40 CFR 260-299? (para H-2-4 b(3))			
(5) Does Activity have up to date copy of 49 CFR 100-177? (para H-2-4 b(3))			
(6) Does Activity have up to date copy of the NAERG? (para H-2-4 b(3))			

(7) Does Activity have up to date copy of Virginia HWM Regulations? (para H-2-4 b(3))				
	YES	NO	NA	
(8) Are Material Profiles approved by the HWAF prior to shipment? (para L-4 c(2))				
(9) Are manifest document numbers being issued by the HWAF? (para H-2-4 d(3))				
(10) Are out bound copies of manifests, LDRs, Profiles, being submitted to the HWAF within 2 working days of shipment? (para H-2-4 e)				
Inspector Comments:				
				

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Universal Waste Management Inspection

Location Building No.:			
Types of Universal Wastes (UWs) being managed (Circle all that apply): UW Lamps	UW Ba	atteries	
UW Pesticides UW Thermostats			
1. Universal Waste Management (UWM):	YES	NO	NA
a. Training:			
(1) Has the UWH received HazCom training? (para C-5a (1)(a))			
(2) Has the UWH received First Responder Awareness Level? (para C-5a (1)(b))			
(3) Has the UWH received BEM training? (para C-5b)			
(4) Does Activity have an up to date Training Management Record on file that documents UWH training? (para C-6c)			
(5) Are UWM training records kept for three years after individuals leave the activity? (para C-6c)			
b. General UWM:			
(1) Does Activity inspect UW sites monthly? (para K-8j)			
(2) Are UWs stored in a manner to prevent discharges or releases? (para K-8a)			
(3) Does UW storage site, excluding UW Lamps have containment? (para K-8b)			
(4) Is Emergency Response Information posted? (para K-8c)			
(5) Does UW site have appropriate spill kit? (para K-8f)			
(6) Do containers of UW have type of UW label? (para I-7a)			
(7) Do UW labels have the ASD marked? (para I-7b)			
(8) Do UWs excluding UW Lamps have a CCL? (para I-7e)			
(9) Are UW container closed appropriately? (para I-2b(2) & I-7g)			
(10) Are UW Lamps being stored in separate containers from serviceable lamps? (para I-7h)			
(11) Are broken UW Lamps being managed as UWs? (para I-7i)			
(12) Are UWs excluding UW Lamps being turned-in within 270 days? (para K-8e)			
(13) Are UW Lamps being turned-in within 60 days or 10 days for full boxes? (paraK-8h)			

Inspector Comments:			
Solid Waste, Recycling, and Pollution Prevention Inspection	n		
1. Solid Waste:	YES	NO	NA
a. Are MSW Dumpsters closed when not having trash, rubbish, etc added? (para I-2b(2))			
b. Are MSW Dumpsters free of the following?			
(1) Hazardous and Non Hazardous Wastes? (para R-7d)			
(2) Universal Wastes (Lamps, Batteries, pesticides, Thermostats)? (para R-7d)			
(3) Rubber tires? (para R-7d)			
(4) Compressed Gas Cylinders & aerosol cans? (para R-7d)			
(5) Containers of liquids? (para R-7d)			
(6) Asbestos or Asbestos container materials? (para R-7d)			
(7) Used oil? (para R-7d)			
(8) White Goods (Stoves, refrigerators, AC units, washers, dryers, etc.)? (para R-7d)			
(9) Industrial (Construction debris, concrete, wood pallets, etc,)?			
(10) Yard Wastes? (para R-7e)			
(11) Recyclable Cardboard? (para R-7g)			
(12) Recyclable White paper? (para R-7g)			
(13) Recyclable Metal, including Aluminum cans? (para R-7g)			
(14) Recyclable Plastics? (para R-7g)			
2. Recycling:			
a. Does the Activity have an Area Recycling Coordinator (s)? (para 2-9a)			
b. Is the Area Recycling Coordinator trained? (para C-5b)			
c. Does the Activity have Recycling areas set up? (para R-11a)			
d. Does the Activity "Source Separate" recyclable materials? (para I-10a)			
e. Are containers of recyclables correctly labeled? (para R-10a)			
f. Are used filters being recycled? (para H-10h)			
g. Are Aerosol cans being handled and turned-in correctly? (H-10e)			

h. Are USED OIL containers labeled "USED OIL"? (para I-9a)			
i. Are USED OIL containers or tanks secured to prevent unauthorized	YES	NO	NA
disposal? (para I-9b)			
j. Does Activity keep records of their Antifreeze recycling? (para H-10d)			

Storm Water Pollution Prevention Inspection

3. St	orm Water Pollution Prevention:	YES	NO	NA
a.	Wash Racks:			
	(1) Does the Activity prevent the used of detergents in the wash racks?			
the w	(2) Does the Activity prevent Hazardous Materials from being disposed in ash Rack?			
	(3) Are mud, heavy soil, rocks and other debris being kept out of the wash Rack?			
	(4) Is the system being properly maintained?			
b.	Motorpools:			
	(1) Does Activity ensure the use of drip pans under parked vehicles?			
	(2) Are Drip pans serviceable?			
	(3) Are contents from drip pans properly disposed?			
	(4) Do containers of liquids have the necessary containment?			
	(5) Are spill kist available?			
	(6) Is the area free from visible existing or previous spills?			
secor	(7) Are bulk fuel transporters (TPUs, tankers, etc) parked on/in dary containment systems? .			
inspe	(8) Are these secondary containment systems serviceable and are ction records available?			
	(9) Are drains and water sources protected from potential spills?			
c.	Oil/Water Separators (OWSs):			
	(1) Does the Activity prevent the used of detergents in the OWSs?			
	(2) Does the Activity prevent Hazardous Materials from being disposed in the OWS?			
	(3) Does the Activity prevent dumping of oil into the OWS?			
	(4) Is the system being properly maintained?			
d.	Tanks (Tank & pump units, HEMTTs, tanker trucks not in motorpools):			
	(1) Do tanks have serviceable "Fill" and "Vent" ports?			
	(2) Are fill and vents free of spilled materials?			

(3) Are spills being reported and cleaned up?	YES	NO	 NA
(4) Are regulated tanks being inspected as required?			
(5) Are alarms operational?			
(6) Are drains and water sources protected from potential spills?			
(7) Do tanks have or are bulk fuel transporters (TPUs, HEMTTs, tanker trucks, etc) parked on/in secondary containment systems?			
(8) Are bulk fuel containers (tank & pump units, HEMTTs, tanker trucks) and their secondary containment systems being inspected at least weekly and the inspections documented?			
e. Watercraft:			
(1) Is containment boom being deployed around the vessel during external fuel transfer?			
(2) Are fuel containers, piping and hoses used during internal and external fuel transfer being monitored by designated personnel?			
(3) Are personnel pumping bilge systems trained and compensating for residual pressure and product when disconnecting from the system?			
4. Inspector Comments:			
		_	

Aboveground Storage Tank Weekly Inspections

1. V	Weekly Inspections:			
	Date of Inspection:			
	Inspectors Name:			
	Building Number:			
	Tank Number:	T T T C C C C C C C C C C	NO	3 74
		YES	NO	NA
a	Containment dike or berm in satisfactory condition (para V1-4h).			
ł	o. Containment area free of excess standing water or oil (para V1-4h).			
C	c. Gate valves used for emptying containment areas secured (para V1-4h).			
C	d. Containment area/base of tank free of high grass, weeds, and debris (para V1-4h).			
	e. Tank shell surface, including any peeling areas, welds, rivets/bolts, seams foundation, visually inspected for areas of rust and other deterioration. (para V1-4h)			
	Ground surface around tanks and containment structures and transfer as checked for signs of leakage (para V1-4h).			
٤	g. Leak detection equipment in satisfactory condition (para V1-4h).			
ł	Separator or drainage tank in satisfactory condition (para V1-4h).			
i	. Tank water bottom drawoffs not in use are secured (para V1-4h).			
j	. Tank fill valves not in use are secured (para V1-4h).			
k	x. Valves inspected for signs of leakage or deterioration (para V1-4h).			
1	. Inlet and outlet piping and flanges inspected for leakage (para V1-4h).			
r	m. All tank gauges have been inspected and are operational (para V1-4h).			
2. In	nspector Comments:			
-				

Aboveground Storage Tank Daily Inspections

1. Daily Inspections:			
Date of Inspection:			
Inspectors Name:			
Building Number:			
Tank Number:			
	YES	NO	NA
a A complete walk-through of the facility property in the area of the aboveground storage tank (AST) to ensure that no hazardous conditions exist (para V1-4g).			
b. An inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils(para V1-4g).			
c. Check the berm or dike area for excessive accumulation of water and to ensure the dike or berm manual drain valves are secured (para V1-4g).			
d. Perform a visual inspection of the exterior tank shell to look for signs of leakage or damage (para V1-4g).			
e. An evaluation of the condition of the AST and the tank's associated equipment (para V1-4g).			
f. Was a discrepancy noted during the daily inspection check (please annotate discrepancy below).			
2. Inspector Comments:			

Underground Storage Tank Monthly Inspections

1. Monthly Inspections:			
Date of Inspection:			
Inspectors Name:			
Building Number:			
Tank Number:			
	YES	NO	NA
a Release Detection System: Inspect for proper operation (para V2-4f).			
b. An Spill Buckets: Ensure spill buckets are clean and empty (para V2-4f).			
c. Overfill Alarm: Inspect for proper operation (para V2-4f). Can a delivery person hear or see the alarm when it alarms?			
d. Fill and Monitoring Ports: Inspect all fill/monitoring ports and other access points to make sure the covers and caps are tightly sealed and locked (para V2-4f).			
e. Ground surface around fill port: Checked for signs of leakage(para V2-4f).			
f. Spill and Overfill Response Supplies: Inventory and inspect the emergency spill response supplies. If the supplies are low, restock the supplies. Inspect supplies for deterioration and improper functioning (para V2-4f).			
g. Dispenser Hoses and Nozzles. Inspect for loose fittings, deterioration, obvious signs of leakage, and improper functioning (para V2-4f).			
h. Dispenser and Dispenser Sumps: Open each dispenser and inspect all visible piping, fittings, and couplings for any signs of leakage. If any water or product is present, remove it and dispose of it properly. Remove any debris from the sump (para V2-4)	 4f).		
i. Piping Sumps: Inspect all visible piping, fittings, and couplings for any signs of leakage. If any water or product is present, remove it and dispose of it properly. Remove any debris from the sump (para V2-4f).			
j. Tank Gauges: Inspected and are operational (para V2-4f).			
2. Inspector Comments:			

Underground Storage Tank Weekly Inspections

1. Weekly Inspections:				
Date of Inspection:				
Inspectors Name:				
Building Number:				
Tank Number:				
	YES	NO	NA	
a A complete walk-through of the facility property in the area of the underground storage tank (UST) to ensure that no hazardous conditions exist (para V2-4f).				
b. An inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils (para V2-4f).				
c. Check the spill containment manhole for excessive accumulation of water (para V2-4f).				
d. Perform a visual inspection of the fill pipe and surrounding areas to look for signs of leakage or damage (para V2-4f).				
e. An evaluation of the condition of the UST and the tank's associated equipment (para V2-4f).				
f. Was a discrepancy noted during the weekly inspection check (please annotate discrepancy below).				
2. Inspector Comments:				
				

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Appendix K

Storage & Accumulation Site Management

K-1. Purpose. This appendix establishes the procedures for establishing, inspecting, and maintaining storage and accumulation sites for Hazardous Materials, Hazardous Wastes, Non-Hazardous Wastes, Universal Wastes, Recycling Materials.

K-2. General Requirements for all Hazardous Materials (HMs) Storage Areas and Hazardous Waste (HWs) Accumulation Sites:

- a. Site Locations:
- (1) Must be correctly sited where a spill or leak of HM, or HWs or NHWs would not constitute a discharge of wastes to surface waters, storm drains, or the sanitary sewage system.
 - (2) Must have containment in sufficient capacity to hold the largest volume of an undetected leak.
- (3) Sites will be protected from the elements. Collection of rain water, HMs, or NHWs or HWs in the containment unit must be containerized and treated as a HW until determined otherwise.
 - b. Required equipment:
- (1) An internal communication or alarm system capable of providing immediate emergency instructions to activity personnel.
- (2) Telephone or hand-held two way radio capable of summoning emergency assistance from the military police.
- (3) Portable fire extinguishers, and/or fire control equipment. Portable fire extinguishers must be a single 20 lb ABC Dry Chemical type or TWO 10 lb ABC Dry Chemical.
 - (4) Spill kit and decontamination equipment.
- (5) Water, at adequate volume and pressure, to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray equipment.
 - c. All areas will have signs indicating (must be readable from 50 feet for outside locations):
- (1) "Hazardous Materials Storage Area" or "Hazardous Waste Temporary Storage Site TSS" or "Hazardous Waste Satellite Accumulation Site SAS"
 - (2) "No Smoking"
 - (3) "Unauthorized Personnel Keep Out"
 - d. Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site.
- e. Each area will have a site specific Contingency plan (CP) specifying emergency procedures to be followed by activity personnel.

- f. Sites storing containers holding ignitable or reactive materials or wastes shall be located at least 50 feet within the installation's property line.
- g. All areas must meet all applicable health, safety, and fire rules and regulations. Personnel should contact Post Safety and the Fire Department for specific requirements.
 - h. All materials and wastes stored in containers IAW Appendix I.
- i. All sites will maintain a copy of the "Incompatible Materials Chart." Copies of this chart may be obtained from the HWAF.

K-3. Hazardous Materials Storage Areas:

- a. All storage areas will be inspected at least monthly using the TCFE Form 192 (Figure K-1, Front Page).
- b. An MSDS will be available on-site for each HM stored and/or used by that activity.

K-4. General Hazardous Waste Accumulation Site Management:

- a. Fort Eustis and Fort Story are Large Quantity Generators and must properly manifest HWs with 90 days of the Accumulation Start Date (ASD); therefore each installation is authorized to accumulate Hazardous Wastes (HWs) in only two types of accumulation areas:
- (1) Less than 90 Temporary Storage Sites (TSSs): TSSs are usually permanent long term waste accumulation sites that support ongoing operations. Occasionally, construction projects or other short term projects may require use of a TSS.
- (2) Satellite Accumulation Sites (SASs). SASs can be permanent or very short term, i.e. days or weeks intended to accumulate very limited quantities and one type of hazardous waste.
- b. TCFE Form 646, Waste Description Log (Figure K-2) provides a written description prepared by the generating Activity for each hazardous and non-hazardous waste which includes: names, quantities, and National Stock Numbers (NSNs) of HMs used (See the activity's AUL); names and quantities of non hazardous materials used; and a description of the process used to generate the waste. A copy of MSDSs, product specifications, or lab analyses will be kept with each WDL.
- c. TCFE Form 199 "Temporary Storage Site and Satellite Accumulation Site Approvals" (Figure K-3) will be used for establishing a new site, relocating an existing site, or closing a site, the proposed action must be approved.
- d. All TSSs and SASs will be inspected at least weekly (within 7 calendar days) using the TCFE Form 6036 (Figure K-4).
- e. Due to mission requirements, a TSS or SAS may be inactivated for a short period of time. The inspection form must be annotated that all wastes have been turned-in and no un-corrected deficiencies remain. Upon reactivation, an initial inspection will be accomplished. DPW-ENRD, utilizing TCFE Form 199 will be notified within 3 working days of both inactivation and reactivation.
 - f. Non-Hazardous Wastes (NHWs) will be accumulated in TSSs or SASs.
- g. Hazardous wastes generated during field training exercises on post or on vessels, which remain on-site over night, must be stored in a SAS.
 - h. The Virginia Department of Environmental Quality (VDEQ) must be notified by DPW-ENRD 15 days in advance

of accumulating wastes in a TSS. DPW-ENRD is required to keep an up to date list of all TSSs and SASs.

K-5. TSS and SAS Approval Process:

- a. DPW-ENRD must grant approval prior to closing a site.
- b. A TSS cannot be changed to a SAS or vice versa without prior written approval from DPW-ENRD.
- c. All activities using any type of outside or free standing storage building should coordinate with DPW Master Planner.
 - d. TSS Approvals:
- (1) The Fire Department, Post Safety Office, and DPW-ENRD must grant approval prior to establishing a new site or relocating an existing site.
 - (2) All TSS requirements must be met before the site can be used or approved.
- (3) At least 20 days prior to the establishment and use of a TSS, a completed approval form must be submitted to DPW-ENRD. All items on the form must be completed. As a minimum, Waste Description Log (WDL) for each waste stream, and site specific Contingency Plan will be included. The form will be signed by the Commander or Director having AEC appointment authority.
- (4) The Fire Department and Post Safety Office must ensure the proposed location or relocation meets fire and safety regulations for the wastes that will be accumulated. Their approval is for location only. The Fire Department and Post Safety Office may conduct additional inspections for fire and safety once the site is operational.
- (5) DPW-ENRD will inspect the site prior to granting final approval. Each site will be given an approval number that must be used for waste disposal and reporting.
 - e. SAS Approvals:
 - (1) All SAS requirements must be met while the site is operational.
- (2) Within 3 days of the establishment and use of a SAS, a draft approval form must be submitted to DPW-ENRD. As a minimum, a Waste Description Log for each waste stream and draft site specific Contingency Plan must be included. This draft may be signed by the AEC. DPW-ENRD will inspect the site to determine if it meets SAS requirements and issue a provisional approval number. The Fire Department and Post Safety Office will be notified by DPW-ENRD.
- (3) If the SAS is expected to continue operating for more than 30 days, then formal approval must be obtained within 30 days. The approval form will be signed by the Commander or Director having AEC appointment authority.
- (4) The Fire Department and Post Safety Office must ensure the location meets fire and safety regulations for the wastes being accumulated.
- (5) DPW-ENRD will inspect the site prior to granting final approval. Each site will be given an approval number that must be used for waste disposal and reporting.

K-6. Less than 90 Day Temporary Storage Sites - TSSs:

- a. May be located at a distant site from the point of initial generation.
- b. May receive HWs from multiple generation sites including SASs.

- c. May store any quantity of HWs.
- d. Accumulation start date must be the date that HW is first put into a container at the TSS or the accumulation start date put on at the SAS.
- e. All containers of HW must be transferred to the HWAF within 14 days of the accumulation start date or 17 days if the waste was transferred from a SAS.

K-7. Satellite Accumulation Sites - SASs:

- a. Must be located at or near the process generating the HW, where the waste initially accumulates and which is under the control of the operator of the process generating the waste.
- b. Must not accumulate more than 55 gallons of HW or one quart of acutely HW (P-listed and some high number F-listed wastes).
- c. The accumulation start date must be filled in when the quantities above are reached or when a smaller container is filled and ready to be turned in. These containers must be transferred to a TSS or the HWAF within three (3) days.
- d. Containers of wastes must be turned in within 1 year from the date of initial accumulation. (THIS IS NOT THE ACCUMULATION START DATE).

K-8. Universal Waste (UW) Sites:

- a. UW sites need to be sited where a spill or leak would not constitute a discharge to surface waters, storm drains, or the sanitary sewage system.
- b. UW sites, excluding UW Lamps must have containment in sufficient capacity to hold the largest volume of an undetected leak.
 - c. Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site.
- d. The Accumulation Start Date (ASD) must be the date that UW is first put into a container or the date the UW container was issued by the HWAF.
- e. UWs, excluding UW Lamps must be turned-in at the Hazardous Waste Accumulation Facility (HWAF) within 270 days of the ASD.
 - f. UWs that have liquids must have containment and the appropriate spill kits (acid, base, mercury, etc).
 - g. Turn-in procedures in Appendix H for HWs will be used for UWs excluding UW Lamps.
- h. UW lamps must be turned-in at the Fort Eustis Solid Waste, Recycle, and Pollution Prevention Center Collection Center (SWCC), Bldg 1209 or the Fort Story Recycling Center, Bldg 1053 within 60 days of the ASD. Full containers must be turned-in within 10 working days and may not exceed the 60-day limit.
 - i. Universal Waste storage sites do not require site approval or signs.
 - j. Universal Wastes will be stored in existing SASs or TSSs where practical.
 - k. Universal Wastes sites will be inspected at least monthly using the TCFE Form 192 (Figure K-1, Back Page).
 - 1. All Universal Wastes stored in containers IAW Appendix I.

K-9. Recycling Areas: To be published.

Appendix K Figure K-1 Page 1

MONTHLY HAZARDOUS MATERIAL SITE INSPECTION

П			Τ						
Inspections must be conducted within 30 days of last inspection.	Bldg No:	 Does site have adequate aisle space? Are HMs stored with adequate containment? Are HMs sheltered from the environment? Are thus sheltered from the environment? Are bungs/rings secured? Are containers tightly closed? Are containers properly labeled as required? Are containers compatible with the stored materials? Are wastes separated from serviceable materials? Are incompatable HMs separated from other HMs? Are incompatable HMs Shower Required? Are Emergency Eye Wash & Shower Required? Is Emergency Eye Wash & Shower Operable? Weekly Monthly? Is the area secured when not in use? 	CORRECTIVE ACTIONS & DATE						
	Bld	ses, etc?	OBSERVATIONS						
sterials Sites and Reverse Side for Universal Waste Sites.		INSPECTION ITEMS: 1. Does area have signs indicating HM storage? 2. Does area have "No Smoking" signs? 3. Does area have "No Smoking" signs? 4. Does area have sign for Emergency Notification Instructions? 5. Does site have copy of Contingency Plan (CP) posted? 6. Is the AUL present? 7. Is the 7 day supply limit being observed? 8. Are MSDSs present for all HMs? 9. Is communication equipment (telephone, radio, etc) available and operational? 10. Are fire extinguishers available? Charged? Seals intact? 11. Is PPE (goggles, gloves, boots, respirators, etc.) available/serviceable? 12. Is spill kit available and serviceable for the type of HMs e.g., POLs, Acids, Bases, etc?	NAME OF INSPECTOR						
r Hazardous Ma		NSPECTION ITEMS: 1. Does area have signs indicating HM storage? 2. Does area have "No Smoking" signs? 3. Does area have "Unauthorized Personnel Kee 4. Does area have sign for Emergency Notificati 5. Does site have copy of Contingency Plan (CP 6. Is the AUL present? 7. Is the 7 day supply limit being observed? 8. Are MSDSs present for all HMs? 9. Is communication equipment (telephone, radi 0. Are fire extinguishers available? Charged? Se 1. Is PPE (goggles, gloves, boots, respirators, etc. 2. Is spill kit available and serviceable for the ty	TIME						
Use This Side for Hazardous Ma	Activity:	INSPECTION ITEMS: 1. Does area have signs indicating 2. Does area have "No Smoking" 3. Does area have "Unauthorized 4. Does area have sign for Emerg 5. Does site have copy of Conting 6. Is the AUL present? 7. Is the 7 day supply limit being a 8. Are MSDSs present for all HM 9. Is communication equipment (10. Are fire extinguishers available 11. Is PPE (goggles, gloves, boots, 12. Is spill kit available and service	DATE						

TCFE Form 192 Mar 03

Appendix K Figure K-1 Page 2

MONTHLY UNIVERSAL WASTE SITE INSPECTION

Inspections must be conducted within 30 days of last inspection.	Bldg No:	Mercury Thermostats:	 Excluding UW Lamps, does the Container Number on CCL and container match? Excluding UW Lamps, are the containers DOT approved? Are containers tightly closed? Are UW Batteries being separated by type? Are UW Lamps being stored separate from serviceable lamps? Are UW Lamps being stored separate from serviceable lamps? Are UW site sited where a spill or leak will not discharge to storm or sanitary system? Boes area have sign for Emergency Notification Instructions? Does site have containment for UWs containing liquids? Does site have spill kits (acid, base, neceury) for UWs containing liquids? 	CORRECTIVE ACTIONS & DATE						,	
		Batteries: Mercury 1	11 12 12 13 15 15 16 16 16	OBSERVATIONS	•						
Use This Side for Universal Waste Sites and Reverse Side for Hazardous Materials Sites.	-	Lamps:	 Do containers have UW labels? Is the type of UW clearly marked on the label? Is the ASD clearly marked on each container? Excluding UW Lamps, are ASDs on containers less than 270 days? Are ASDs on full boxes of UW Lamps less than 10 days? Are ASDs on partially full boxes of UW Lamps less than 60 days? Are broken UW Lamps being managed as UW? Excluding UW Lamps, are turn-ins being recorded on Container Turn-in Logs? Is this UW site on the AEC's log of UW sites for the Activity? Excluding UW Lamps, are Container Contents Logs (CCL) present for all UWs? 	NAME OF INSPECTOR						*	
his Side for Universal W	Activity:	INSPECTION ITEMS: Type of UW Storage:	 Do containers have UW labels? Is the type of UW clearly marked on the label? Is the ASD clearly marked on each container? Excluding UW Lamps, are ASDs on containers Is. Are ASDs on full boxes of UW Lamps less than 6. Are ASDs on partially full boxes of UW Lamps 7. Are broken UW Lamps being managed as UW? Excluding UW Lamps, are turn-ins being record 9. Is this UW site on the AEC's log of UW sites for 0. Excluding UW Lamps, are Container Contents I. 	DATE TIME							

Appendix K Figure K-2 Page 1

	WASTE DESC	RIPTION LOG (WDL)						
Authorized Site Number:			HWAF USE ONLY: Profile No.					
2. Activity:		A CONTRACTOR OF THE PARTY OF TH	Codes:					
3. Activity Point of Contact:								
		The second second	Source:					
5. Date:								
6. New Waste Stream		fy Existing Waste Stream	8. Annual Update					
P. Hazardous Materials Informat National Stock Number	Cage No.	MSDS Serial No.	Trade Name or Item Name					
10. List of Non-Hazardous Mater	ials Used:							
11. Description of How the Wast	e was Generated usin	ig the above Materials:						
	No City of City							
			<u> </u>					
		<u></u>						
	-d Addison-Hill Co		B 1 . 2					

Appendix K Figure K-2 Page 2

Instructions: (Entries must be typed.)

- Enter the Authorized Site Number in Item 1. This should be the site at which the waste initially accumulates
 not necessarily where the waste is turned-in to the HWAF. If this is a new site leave blank.
- 2. Enter the name of the Activity in Item 2
- 3. Enter the HWC or AEC name in Item 3.
- 4. Enter phone number in Item 4 for person listed in Item 3.
- 5. Enter dute prepared or last modified in Item 5. Waste streams must be reviewed at least annually,
- 6. Check this block, if this is a new waste stream or first submission.
- 7. Check this block, if this is an modification to an existing waste stream.
- 8. Check this block, if this is an annual update with no changes to an existing waste stream.
- 9. In Item 9, all Hazardous Materials (HMs) which may be in the waste stream must be listed. If the MSDS for the HM is from the DOD Hazardous Materials Information System, then provide the NSN, Cage No., MSDS Scrials No., and brief description from the Trade Name or Item name from the MSDS. A copy of the HMIS MSDS does not need to be given to the HWAF. If the MSDS is not form HMIS or the HM does not have NSN, then put the Manufacturer's name in the NSN block and provide a brief description. A copy of the MSDS must be provided to the HWAF. If the waste stream has analytical data, then provide a copy of the data and enter "See Attached Data" in the NSN block. A copy of each MSDS or analytical data must be attached with the Activity's copy of the Log.
- 10. In Item 10, list all of the non-hazardous components of the waste stream.
- 11. In Item 11, provide a detailed description of how the waste stream was generated. This description should be from 1 to 5 sentences long. This statement must include an estimate of how much of each hazardous and non-hazardous materials are in the waste stream.
- 12. Use Item 12 to provide a complete list of the HMs if the list of HMs is too long for Item 8.

National Stock Number	Cage No.	MSDS Serial No.	Trade Name or Item Name
A SHIP TO BE SHOWN	W. College Col		
	8 7 7 7 7 7 7 7 7		
100 kins - 1 20 - 1350			
	A. E. S. E. F		
	7		

Page 2 of

Appendix K Figure K-3 Page 1

HWM Accumulation Site Approval

Man fair and a training of the second	Transferential one repprovat	All and court for the second second
Instruction	s for completing this form are on the re	verse side.
1. Request Date:	2. Type of Accumulation S	ite: TSS SAS
Type of Approval being requested: (Che	eck Only One)	
3. Initial Notification of Ne 4. New Accumulation Site		eation of an Existing Site are of an existing site
7. Temporary Action: Inac	etivation Reactivation Da	ate by Activity:
Generating Activity:	8. Building Number of Sit	e:
	9. DODAAC:	
10. Group or Brigade:		
11. Battalion or Directorate:		
12. Company or Division:		Totaliana
 Name and Grade of HWC: Name and Grade of AEC: 		Telephone:
14. Name and Grade of AEC;		Telephone:
	d by Activity: re stored or will be stored at the site. this site? as the site been decontaminated? Inspection" Checklist	Certified Yes No Yes No Included Signature
	V6D-11-	lion Commander or Director:
Telephone:	Name of Dana	non Commander or Director.
reiepitotie.	Ti	tle and Rank/Grade:
Approvals:		
24. Post Safety Office:	Name and Title:	Dore
	Name and Title:	Date
25. Post Fire Department:		
	Name and Title:	Date
PW-ENRD Approval:		
26. Date of Final Approval:	27. Authorized Site	Number:
28. Date of Inact/React:	29. Date of Final Clo	isure :
		200
	Signature of DPW, I	NRD Personnel

TCFE Form 199 Mar 03 (Previous Edition is Obsolete)

Appendix K Figure K-3 Page 2

Instructions for TCFE 199

- ITEM 1: Enter the current date.
- ITEM 2: Check either the TSS (Temporary Storage Site) block or the SAS (Satellite Accumulation Site) block depending on which type of site is involved.
- ITEM 3: Within 3 working days of creating a new SAS, this form must be received by DPW-ENRD. Check item 3 and complete item 8 through 17 and Block 23. The Contingency Plan (CP) may be a draft and the AEC may sign the certification.
- ITEM 4: For all TSSs and SASs which will be established for longer than 30 days, check item 4, complete items 8 through 18, and items 23 through 25 before submitting to DPW-ENRD. Commander or director must sign the certification.
- ITEM 5: All requests for relocations must be coordinated with DPW-ENRD before any move is accomplished.
- ITEM 6: Check item 6 and complete items 8 through 14 and items 19 through 23 before submitting to DPW-ENRD.
- ITEM 7: Check either the Inactivation or Reactivation block. Complete items 19, 22, and 23 for Inactivations or item 23 for Reactivations. AECs may sign the certification. Sent to DPW-ENRD within 3 working days.
- ITEM 8: Enter the building number of the site or closest building to the site.
- ITEM 9: Enter the DODAAC number, which will be used, on the DD Form 1348-1A.
- ITEM 10: Enter the Group or Brigade information or the activity's next higher headquarters.
- ITEM 11. Enter Battalion or Directorate information.
- ITEM 12: Enter Company or Division information.
- ITEM 13: Enter name, grade, and telephone number of the HWC.
- ITEM 14: Enter name, grade, and telephone number of the AEC.
- ITEM 15: Check block and provide copy of strip map of the site's location. Does not need to be to scale.
- ITEM 16: Check block and provide copy of site specific Contingency Plan (CP).
- ITEM 17: Check block and provide copy of Waste Description Logs (WDL).
- ITEM 18: Enter the Site Number for the existing site.
- ITEM 19: Check block to certify that: "No wastes are currently being stored or will be stored at this site".
- ITEM 20: Check "Yes" if any spills have ever occurred at this site, otherwise certify a "No" response.
- ITEM 21: If "Yes" to item 19, the site must be decontaminated. Check if this has been done or not done.
- ITEM 22: Check block and provide copy of the last "Weekly Site Inspection" checklist.
- ITEM 23: The information listed above must be certified by the authority, which appoints the appropriate AEC.
- ITEM 24: the Post Safety Office must approve the site location.
- ITEM 25: the Post Fire Department must approve the site location.
- ITEM 26: ENRD will issue a date of final approval of a new SAS.
- ITEM 27: ENRD will conduct a final site inspection and issue a dated final Authorized Site Number, upon receiving

all approvals and associated documents.

ITEM 28: ENRD will issue a date of final approval of Inactivation or Reactivation.

ITEM 29: ENRD will issue a date of final closure.

Appendix K Figure K-4

	ste streams? DOT, Empty) , UW 270 Days	ω	
	each was each was ; NHW, ; 14 Days Iuired? Month! ole/service wAF?	& DAT	
HWAF	ed within 7 calendar days of last inspection. 16. Is the Waste Description Log with MSDSs present for each waste streams? 17. Are containers properly labeled as required? (HW. UW, NHW, DOT, Empty) 18. Are the containers compatible with the stored materials? 19. Are wastes separated from serviceable materials? 20. Are incompatible wastes separated from other wastes? 21. Does container have unique container number? 22. Is correct generator or shipper address present? 23. Is DOT proper shipping name & UN/NA on HW labels? 24. Are Accumulation Times being met? SAS 3 Days; TSS 14 Days, UW 270 Days 25. Are EPA waste codes correct for HW labels? 26. Is accumulation start date on HW and UW labels as required? 27. Is Emergency Eye Wash & Shower Operable? Weekly Monthly? 28. Is PEE (goggles, gloves, boots, respirators, etc.) available/serviceable? 29. Is the area secured when not in use? 30. Are any containers stored longer than 75 days at the HWAF?	CORRECTIVE ACTIONS & DATE	
	with M5 with M6 as req ed as req ed as req ed as req is with th riviceable trated from ontainer raddress; & UNA g and HW and HW and HW and HW and hover Oliver Oliv	ORREC	
SAS	ion Log tion tion tion tion tion tion tion tion		
	ndar day Descript Descript ainers co eparated attible was ner have nerator o nerator o see shippi attion Tii attion start y See Wy y See Wy y See Wy aners stanners st		
Authorized Site No. TSS	ons must be conduct	OBSERVATIONS	
	type of HW storage? 8? onnel Keep Out" signs? Notification Instruction ? Plan (CP) posted? ? hone, radio, etc) availabl arged? Seals intact? ? g leaking containers or si ntainment? Sheltered fro re of dents, rust, leaks, et iners tightly closed? ? ?	NAME OF INSPECTOR	
vity:	INSPECTION ITEMS: 1. Does area have signs indicating the ty 2. Does area have "No Smoking" signs? 3. Does area have "Unauthorized Person 4. Does area have sign for Emergency N 5. Does site have copy of Contingency P 6. Does site have adequate aisle space? 7. Is communication equipment (telepho 8. Are fire extinguishers available? Chan 9. Is spill kit available for overpacking I 11. Are the containers DOT approved? 12. Are the containers DOT approved? 13. Are the containers Serviceable? (Free ontainers Dot approved? 14. Are bungs/rings secured? Are contain. 15. Is a Container Contents Log present &	TIME	
Generating Activity:	INSPECTION ITEMS: 1. Does area have sig 2. Does area have "N 3. Does area have sig 4. Does site have cop 5. Does site have ade 7. Is communication 8. Are fire extinguish 9. Is spill kit available 10. Are drums available 11. Are wastes stored 12. Are the containers 13. Are the containers 14. Are bungs/rings see 15. Is a Container Con	DATE	

TCFE Form 6036 Mar 03 (Previous Edition is Obsolete)

Insert TCFE Form 6036

WEEKLY HW ACCUMULATION SITE INSPECTION

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APPENDIX L1

INFORMATION PAPER

ATZF-PWE Action Officer: Joanna Bateman

Phone: 878-4123 ext. 303 Date: 30 December 2002

SUBJECT: Fort Eustis Installation Restoration Program

PURPOSE: To provide information regarding the Fort Eustis Installation Restoration Program (IRP).

FACTS:

- 1. The Installation Restoration Program (IRP) is the Army's implementation of the Defense Environmental Restoration Program (DERP) which identifies, investigates and cleans up contamination at active/operating Army installations. Fort Eustis is currently conducting environmental cleanup efforts under the guidelines established in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) or an established Commonwealth of Virginia environmental program. The Environmental Division within the Directorate of Public Works manages the IRP program at Fort Eustis.
- 2. In 1988, the US Army Toxic and Hazardous Materials Agency identified 34 potential waste sources at Fort Eustis following the IRP guidelines. The sources included unlined landfills; pesticide storage areas; firefighting training areas; maintenance shops; and range and impact areas resulting from anti-aircraft training activities. Fort Eustis was included on the Environmental Protection Agency's National Priorities List (NPL), or Superfund, in December 1994.
- 3. There are currently 27 sites being managed under the IRP at Fort Eustis, which include: landfills; tank areas; dredge/sludge areas; surface water; fire training/burning areas; storage areas and explosives areas. The most common contaminants found at these sites were polychlorinated biphenyl (PCBs), petroleum/oil/lubricants, metals and volatile organic compounds (VOCs). All sites have been screened or are currently being screened for levels of contamination. Of the 27 sites, 4 sites require long term monitoring from cleanup efforts that have already been implemented, 9 sites are currently undergoing site inspections or remedial investigation/feasibility study actions, and 14 sites require "no further action".
- 4. Information regarding these IRP sites is available via the Fort Eustis Administrative Record (AR) file and Information Repositories (IR). The AR file is comprised of all the guidance, correspondence and documents used to make a remedial decision at an IRP site. The AR file also provides an additional mechanism for public participation during the CERCLA process of selecting a remedy. The Fort Eustis AR file is maintained at the Fort Eustis Environmental Office and three local libraries (IR), which include Groninger Library, Christopher Newport University Library, and Grissom Public Library.
- 5. Though each IRP site varies, groundwater monitoring is common to many of these sites. Monitoring wells are located throughout the sites and are used for collecting data for investigative studies, as well as part of long term monitoring. Disturbance of these monitoring wells must be avoided.
- 6. In 1995, Fort Eustis instituted "catch and release" fishing restrictions at Eustis Lake based on a human health risk assessment conducted by the US Army Center for Health Promotion and Preventive Medicine. An interim removal action was completed at Brown's Lake in 1999, which included excavation, lake restoration, and fish stocking. Fishing is currently not permitted at Brown's Lake while monitoring is being conducted.

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APPENDIX L2

INFORMATION PAPER

ATZF-PWE Action Officer: Joanna Bateman

Phone: 878-4123 ext. 303 Date: 24 April 2003

SUBJECT: Fort Story Installation Restoration Program

PURPOSE: To provide information regarding the Fort Story Installation Restoration Program (IRP).

FACTS:

- 1. The Installation Restoration Program (IRP) is the Army's implementation of the Defense Environmental Restoration Program (DERP) which identifies, investigates and cleans up contamination at active/operating Army installations. Fort Story is currently conducting environmental cleanup efforts under the guidelines established in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) or an established Commonwealth of Virginia environmental program. The IRP program at Fort Story is managed by the Environmental Division within the Directorate of Public Works.
- 2. There are currently 11 sites being managed under the IRP at Fort Story, which include: landfills; tank areas; wash rack areas; fire training/burning areas; wetlands; and an auto shop area. The most common contaminants found at these sites were petroleum/oil/lubricants, metals, and volatile organic compounds (VOCs). All sites have been screened or are currently being screened for levels of contamination. Of the 11 sites, 1 site is currently undergoing remedial investigation/feasibility study, 1 site requires long term monitoring, 2 sites have been proposed for "no further action" (document has not been finalized), and 7 sites require "no further action".
- 3. Though each IRP site varies, groundwater monitoring is common to many of these sites. Monitoring wells are located throughout the sites and are used for collecting data for investigative studies, as well as part of long term monitoring. Disturbance of these monitoring wells must be avoided.
- 4. Information regarding these IRP sites is available at the Fort Eustis Directorate of Public Works, Environmental Division.

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Appendix M

Natural Resources Management

M-1. Purpose. This appendix establishes policies and designates installation responsibilities for coordinated management of natural resources, including ecosystem management for habitats, listed species, and fis h and wildlife naturally occurring at Fort Eustis and Fort Story, Virginia.

M-2. Key Applicable Regulations.

- a. The Endangered Species Act requires federal facilities to implement programs to protect and conserve federally listed endangered and threatened plants and wildlife.
- b. The Sikes Act requires fish and wildlife conservation and mandates federal facilities to execute cooperative plans with the US Fish and Wildlife Service and State Fish and Wildlife Agencies for managing fish and wildlife.
- c. The Clean Water Act mandates the identification, delineation, and protection of wetlands and requires permits for actions which affect wetlands.
- d. A memorandum from the Deputy Under Secretary of Defense for Environmental Security dated 8 August 1994, Subject: *Implementation of Ecosystem Management in the DoD* states that ecosystem management is the basis for management of DoD lands and waters.
- e. A memorandum from the Deputy Assistant Secretary of the Army for Installations and Housing (known as the "Johnson Memorandum") dated 18 August 1989, Subject: *Policy Regarding Endangered Species Management Requirements on Army Installations* requires that consideration be given to species protected by both federal and state laws. In addition, the policy directs that candidate species be treated as listed species for the purpose of managing natural resources or supporting military mission requirements.
- f. Army Regulation (AR) 200-3, *Natural Resources -- Land, Forest and Wildlife Management*, provides Army policy for managing natural resources.
- g. AR 200-5, *Pest Management*, provides Department of the Army Pest Management Program policies to meet legal compliance requirements in implementing DOD Instruction 4150.7, comply with national policies, and support the military mission.
 - h. Fort Eustis Regulation (TCFE Reg.) 210-15, (Dated 30 August, 2001) Hunting, Fishing and Trapping.
- M-3. Policy. It is the policy of Fort Eustis, consistent with the military training mission, to:
 - a. Minimize activities that contribute to the degradation of natural resources.
 - b. Manage for biological diversity through the protection and enhancement of natural ecosystems.
- c. Promote the sound use of natural resources and provide for forest products, fish and wildlife habitat, recreational support, environmental education opportunities, and support of scenic and aesthetic values.

M-4. Responsibilities.

a. The Director of Public Works (DPW) will exercise staff responsibility for the natural resources management program. The Environmental and Natural Resources Division (ENRD), Public Works will coordinate execution of the program and will:

- (1) Prepare and maintain the installation Integrated Natural Resources Management Plan (INRMP).
- (2) Coordinate the installation timber harvest, and fish and wildlife management programs with appropriate agencies; maintain liaison with the agencies through cooperative agreements as required.
 - (3) Provide guidance to land users for protecting and preserving natural resources.
 - (4) Review all master plans and updates for natural resources impacts.
 - (5) Prepare, maintain, and coordinate all actions for implementing the Installation Pest Management Plan.
- (6) Provide natural resource guidance to the Directorate of Personnel and Community Activities (DPCA) to insure that the recreational hunting and fishing programs operated by the DPCA under Fort Eustis, TCFE Reg. 210-15 comply with the requirements of the INRMP.
- (7) Coordinate and publish local policies/regulations as necessary to accomplish natural resources management programs.
- (8) Provide input to other installation regulations (e.g., Fort Eustis Reg. TCFE 210-15) as needed to reflect natural resources management policy.
- (9) Ensure that natural resources and ecosystem values receive consideration in all land leases and outgrants and that environmental protection and provisions of the INRMP are included in the lease or outgrant agreement.
- (10) Ensure that dredge soil sites, mulch and compost areas are maintained, ie; proper water levels, erosion and exotic weed control.
 - b. The Master Planner, DPW will:
 - (1) Insure the INRMP is fully integrated into the Installation Master Plan.
 - (2) Coordinate and monitor all actions for implementing the INRMP.
 - (3) Conduct an annual review of the INRMP.
- c. The DPCA will manage the installation recreational hunting and fishing programs in accordance with TCFE Reg. 210-15, and will ensure coordination with ENRD so that the programs are managed within the requirements of the INRMP.
 - d. The Commander, Fort Eustis and Fort Story will:
 - (1) Insure the preparation and implementation of an INRMP applicable to the installations.
- (2) Provide guidance to commanders of training units to insure that training activities are accomplished in concert with the requirements of the INRMP and this regulation.
 - e. Major subordinate commanders will:
- (1) Ensure that the development of training programs includes the assessment of potential impacts to natural resources. Coordination will be made with ENRD (Tel. 757-878-4123) for information and guidance on environmental documentation that may be required for planned major exercises.

(2) Conduct training activities in accordance with this regulation to avoid or minimize damage to natural resources.

M-5. Cantonment Area Land Management.

- a. The use of all land resources within the cantonment area, to include construction of facilities, road and trail construction/maintenance, and all landscaping, will be accomplished/approved by ENRD-DPW in accordance with the installation Master Plan.
- b. Construction setbacks are required for streams/creeks, wetlands, and other water bodies on the Fort Eustis installation. Proponents of projects in the vicinity of water bodies will consult with ENRD at 878-4123 (ENRD-Fort Story 878-4123) to determine specific setback distances.
- c. All unit activity commanders and family housing residents will maintain the ground surface, grass, shrubs, and trees within their area of responsibility. No refuse items or materials may be disposed of by leaving them on the ground in their area or surrounding areas. The Garrison mowing crew will maintain all vegetation around the Installation Headquarters and all areas not assigned to or occupied by a unit, activity, or tenant. DPW contractor will perform all required pest management activities, in accordance with the Installation Pest Management Plan.
 - d. Damaging trees is strictly prohibited.
- e. The destruction of vegetation contributes to soil erosion and the loss of wildlife habitat. Throughout the cantonment/non-training area (including housing areas), it is not permissible to:
 - (1) Damage woody vegetation.
- (2) Drive or park any motor/tactical vehicle or motor-driven cycle anywhere other than on designated roads, trails, training areas, parking areas, or recreational facilities specifically intended for such use.

M-6. Downrange Land Management.

- a. The construction/maintenance of all downrange land resources, including all facilities, roads, trails, firebreaks, dam construction and maintenance activities, and vegetation maintenance activities will be coordinated with ENRD for approval to insure compliance requirements are met and projects are consistent with the INRMP.
- b. The requirement in paragraph 5b above for consulting with the environmental office for construction setback requirements on streams/creeks, wetlands, and other water bodies on installation or sub-installation lands also applies downrange.
- c. Unit commanders will conduct training activities so as to avoid damaging sensitive areas and resources depicted in the published Environmental Coordination Maps for Fort Eustis and Fort Story.

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Appendix N

Cultural Resources Management

N-1. PURPOSE. This appendix establishes policy, responsibilities, and procedures for management of cultural resources on lands subject to effects from Forts Eustis & Story.

N-2. KEY APPLICABLE REGULATIONS.

- a. Antiquities Act of 1906 (Public Law 59-209; 16 U.S. 431-433).
- b. National Historic Preservation Act (NHPA) of 1966, as amended (Public Law 89-665; 16 USC 470-470w-6).
- c. National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190; 42 USC 4321-4347).
- d. Archeological and Historic Preservation Act (AHPA) of 1974 (Public Law 93-291; 16 USC 469-469c).
- e. Archeological Resources Protection Act (ARPA) of 1979 (16 USC 470aa-47011).
- f. American Indian Religious Freedom Act (AIRFA) of 1978 (Pubic Law 95-341; 42 USC 1996).
- g. Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (Public Law 101-601).
- h. Title 36, Code of Federal Regulations (CFR), Part 60, National Register of Historic Places.
- i. Title 36, Code of Federal Regulations (CFR), Part 61, *Procedures for Approved State and Local Government Historic Preservation Programs*.
- j. Title 36, Code of Federal Regulations (CFR), Part 78, Waiver of Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act.
 - k. Title 36, Code of Federal Regulations (CFR), Part 800, Protection of Historic Properties.
 - 1. Title 43, Code of Federal Regulations (CFR), Part 7, Protection of Archaeological Resources.
- m. Department of Defense (DoD) Directive 4710.1 of 21 June 1984, *Archaeological and Historic Resources Management*.
 - n. Army Regulation (AR) 200-4, Cultural Resource Management.

N-3. GENERAL.

- a. Forts Eustis & Story contain historic and prehistoric archeological resources, his toric landscapes, historic buildings, and traditional cultural use areas. These places are collectively identified as 'cultural resources'.
- b. Management of cultural resources includes the location, inventory, assessment, and wise use of historic, prehistoric, and traditional cultural resources, and records about these resources.
- **N-4. POLICY.** Comply with all federal and state laws, and DoD directives that pertain to the management of cultural resources on federal lands.

- **N-5. RESPONSIBILITIES.** Successful management of cultural resources requires the participation of individuals and commanders at all levels. Specific responsibilities are indicated below.
 - a. The Forts Eustis & Story Garrison Commanders (GC) will:
 - (1) Provide overall direction and control for inventory and management of cultural resources.
 - (2) Approve cultural resource management goals and plans.
- (3) Ensure the consideration of the effects of installation mission activities on historic and traditional cultural properties.
- b. Directorate of Public Works (DPW) will exercise staff responsibility for cultural resources management. The Environmental and Natural Resources Division (ENRD) will coordinate program execution at Forts Eustis & Story:
- (1) Prepare cultural resource management goals and plans for approval by the GC and make other cultural resource recommendations as appropriate.
 - (2) Implement approved management goals and plans.
 - (3) Program fiscal and personnel assets for cultural resource management.
 - (4) Review all construction and renovation projects for potential effect on cultural resources.
- (5) Identify the concerns of pertinent individuals and agencies on the significance of cultural resources and the possible effects of mission activities on historic and traditional cultural properties.
 - (6) Maintain a complete and accurate inventory of known cultural resources, especially of historic properties.
 - c. Battalion and higher level commanders, and staff directors will:
- (1) Emphasize awareness within their commands and directorates of the existence of historic and traditional cultural properties on Forts Eustis & Story.
- (2) Insure that information on the locations or potential for cultural resources is obtained during planning for training or other mission activity. Contact the ENRD at 878-4123 if information is lacking or questionable. Inform ENRD of plans that include subsurface activities or activities on any kind in or around a known or potential historic or traditional cultural property.
- (3) Upon discovery of any historic or prehistoric cultural remains, cease mission activities in the vicinity, and, within 24 hours, inform the ENRD, DPW.
- (4) Inform ENRD of any reports of unauthorized excavation or removal of historic or prehistoric cultural materials.
 - (5) Assist in the implementation of cultural resource management goals and plans.
 - d. Individuals will:
 - (1) Not disturb or remove any historic or prehistoric cultural materials.
 - (2) Inform superiors of any historic or prehistoric cultural materials they observe.

(3) Inform superiors of any unauthorized excavations or removal of historic or prehistoric cultural materials.

Appendix O

Ozone Depleting Chemicals

O-1. Purpose.

- a. Establishes policy, responsibilities and procedures for managing Ozone Depleting Chemicals (ODCs), sometimes referred to as Ozone Depleting Substances (ODSs) that are required in the performance of Fort Eustis and Fort Story daily mission activities.
- b. Implements Installation policy to for complying with Department of Army, federal, state and local policies and regulations.

O-2. General.

- a. ODCs are a group of chemical compounds that include chemicals commonly referred to as "chlorofluorocarbons." As the name indicates, these compounds are generally composed of carbon, chlorine, and fluorine atoms in various combinations. Some additional ODCs have bromine atoms in the compounds. Generally, ODCs are relatively non-toxic, non-flammable, and stable chemicals.
- b. ODC's chemical and physical properties made them ideal substances for refrigeration, solvents, and fire suppressants. These compounds have been and are still widely used in various operations. At the surface, they cause few problems. However as they migrate to the upper atmosphere where intense sunlight causes them to decompose and react with ozone molecules is where the environmental problems occur. This reaction with the ozone causes ozone molecules to be destroyed, thus allowing the intense ultraviolet radiation to reach the surface and cause significant damage to the quality of life.
- c. The rules and regulations pertaining to the management of ODCs divides them into classes, Class 1 ODCs (Tab 1) being the most damaging to the ozone layer and environment. The regulations also establish a number of basic requirements: eliminate the production and use of Class 1 ODCs, training and certification of servicing technicians, monitoring and mandatory upgrade or replacement of equipment; prohibition for DOD from purchasing and contracting Class 1 ODCs, etc.

O-3. Key applicable regulations.

- a. Clean Air Act (CAA) of 1990 with amendments, specifically Title VI.
- b. Public Law (PL 102-483, Section 326) Elimination of Use of Class 1 ODCs
- c. 40 CFR 82.156
- d. Executive Order12843 Procurement Requirements and Policies for Federal Agencies for ODSs.
- e. Fort Eustis ODC Elimination Plan.
- f. Fort Story ODC Elimination Plan.

O-4. Policy.

- a. It is Army's and Installations' policy to minimize the procurement, use, and emissions of ODCs to the greatest extent possible.
 - b. The short time goal is to eliminate all Class 1 ODCs from Fort Eustis and Fort Story.

c. The long-term goal is to eliminate ODCs altogether from the Army's use and inventory.

O-5. Responsibilities.

- a. Only the Commanding General can authorized the purchase of Class 1 ODCs and only under special circumstances.
- b. All Activities must plan and fund the upgrading, retrofitting, or replacement of equipment containing Class 1 ODCs IAW the basic tenants of the Installation ODC Elimination Plan. Activities can continue to use equipment filled with Class 1 ODCs pass FY03, however, only installation stocks of ODCs will be used and no commercial purchases are allowed. If equipment cannot be supported with installation stocks, then the equipment must be upgraded, retrofitted, or replaced.
- c. Each Activity at the Group, Brigade, Directorate level must maintain an inventory of all equipment containing ODCs both government and non-government owned under the control of their organization or personnel. As a minimum, the inventory will include: type and location of equipment; type of ownership, government or non government; type and quantity of ODC; upgrading, retrofitting, or replacement of ODC; records of services and amount of ODCs added to system. A MS Access database will be provided by DPW-ENRD to maintain this inventory. For Activities with ODC equipment serviced by DPW, the Facilities Support Division (FSD) of DPW will maintain the database. These Activities will still maintain an inventory of type and location to ensure all equipment is accounted for. The updated inventory will be submitted to ENRD by 31 January of each Year or more often as required.
- d. Activities utilizing products, which have Class 1 ODCs as components, must document the requirement to use the Class 1 ODC and must prove that there is no approve substitute for the Class 1 ODC. As with all Hazardous Materials, all ODCs must be acquired through the HazMart.
- e. Activities will ensure that their personnel are instructed not to vent any ODCs to the atmosphere, as this is a significant legal infraction. Only personnel who have completed the EPA's training and certifications program are allowed to service or otherwise maintain ODC containing equipment. Each Activity will maintain a list of personnel who are certified.
- f. All ODC containing equipment, generally small appliances, being disposed must have the ODC and contaminated oil removed form the equipment by a certified technician. It's the owner's responsibility to fund this. Documentation of this removal will be provided at the time of turn-in. The certified technician will sign a statement listing the serial number of the equipment and date of removal along with a copy of their license. Metal parts of these appliances will be separated from the non-metal portions prior to turn-in at the Solid Waste Recycling and Pollution (SWRP2) Centers. Abandoned equipment found on Post will be reported to the Military Police and then taken to SWRP2 Center for disposal. DPW-FSD will provide the certified technician for removing the ODCs.
- g. DPW-FSD will maintain a supply of ODCs to be used by the installation. All excess ODCs destined for turned-in or disposal will be coordinated with DPW-FSD in order to determine the installation's need for the ODC. All ODCs declared excess to installation requirements will be turned-in to the Defense Logistics Agency (DLA) who maintains the DOD ODC Reserve. The turn-in should be to the Defense Depot Richmond (DDRV) SW04, Cylinder Operations, 8000 Jefferson Davis Highway, Richmond, VA. 23297-5900 (804-279-4256/2393 or DSN 695-4256/2393). It's the Activity's responsibility for funding the disposal, which includes any transportation and associated costs. Typically there is no charge for disposal, but packaging and transportation, etc., usually does incur a monetary charge. Activities will notify DPW-ENRD of all turn-ins.
- h. ODCs which cannot be reutilized by the installation or turned-in to DLA must be treated as hazardous or non-hazardous wastes and turned into the HWAF IAW Appendix H.

Tab 1 Appendix O

CLASS I ODCs

O-1-1. Group I (from section 602 of the <u>CAA</u>)									
Trichlorofluoromethane	CFC-11	(CCl3F)	75-69-4						
Dichlorodifluoromethane	CFC-12	(CCl2F2)	75-71-8						
1,1,2-Trichlorotrifluoroethane	CFC-113	(C2F3Cl3)	76-13-1						
Dichlorotetrafluoroethane	CFC-114	(C2F4C12)	76-14-2						
Monochloropentafluoroethane	CFC-115	(C2F5Cl)	76-15-3						
O-1-2. Group II (from section 602 of the CAA)									
Bromochlorodifluoromethane	Halon 1211	(CF2ClBr)	353-59-3						
Bromotrifluoromethane	Halon 1301	(CF3Br)	75-63-8						
Dibromotetrafluoroethane	Halon 2402	(C2F4Br2)	124-73-2						
O-1-3. Group III (from section 602 o	of the <u>CAA</u>)								
Chlorotrifluoromethane	CFC-13	(CF3Cl)	75-72-9						
Pentachlorofluoroethane	CFC-111	(C2FCl5)	354-56-3						
Tetrachlorodifluoroethane	CFC-112	(C2F2C14)	76-12-0						
Heptachlorofluoropropane	CFC-211	(C3FCl7)	422-78-6						
Hexachlorodifluoropropane	CFC-212	(C3F2C16)	3182-26-1						
Pentachlorotrifluoropropane	CFC-213	(C3F3C15)	2354-06-5						
Tetrachlorotetrafluoropropane	CFC-214	(C3F4Cl4)	29255-31-0						
Trichloropentafluoropropane	CFC-215	(C3F5C13)	4259-43-2						
Dichlorohexafluoropropane	CFC-216	(C3F6C12)	661-97-2						
Chloroheptafluoropropane	CFC-217	(C3F7C1)	422-86-6						
O-1-4. Group IV (from section 602 o	f the <u>CAA</u>)								
Carbon tetrachloride		CC14	56-23-5						
O-1-5. Group V (from section 602 of the CAA)									
Methyl Chloroform (1,1,1-trichlor	oethane)	(C2H3Cl3)	71-55-6						
O-1-6. Group VI (listed in the <u>Accelerated Phaseout Final Rule)</u>									
Methyl Bromide		(CH3Br)	574-83-9						
		O-1-1							

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Appendix P

Polychlorinated Biphenyl (PCB) Items

P-1. General.

- a. PCBs with contamination levels of 50 parts per million (ppm) or greater are regulated under the federal Toxic Substance Control Act (TSCA), while those with levels between 2 and 49 ppmare regulated by the State of Virginia. Items with levels of 500 ppm or greater are called PCB Items. Items with PCBs levels between 50 and 499 ppm are know as PCB-Contaminated. Items below 50 ppm are called non-PCB. Disposal of Electrical equipment such as transformers and capacitors must be coordinated through ENRD to insure proper disposal. Any spilled material from electrical equipment must be considered as containing PCBs and handled as hazardous waste until proven otherwise.
- b. As of the publication of this regulation, there are no known transformers, regulators, or switches in the Fort Eustis or Fort Story electric system that have PCB contamination levels of 50 ppm or greater. Transformers, switches, and regulations with contamination levels between 2 and 49 ppm remain in service on Fort Eustis.
- c. Older fluorescent light ballasts contain PCBs. Any fluorescent light ballasts taken out of service should be turned-in to the Hazardous Waste Facility for proper disposal.

P-2. ENRD will:

- a. Insure that all PCB Items turned in are transferred to DRMO for transportation to an authorized disposal facility such that the item is disposed of within 1 year of the date removed from service.
- b. Prepare the annual document log required by 40 CFR 761.180 for use or storage of PCB items with a total weight of 45 kilograms or more.

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Appendix Q

Pollution Prevention, Environmental Management System, and Sustainability

Q-1. Purpose. This appendix outlines policy, establishes responsibilities, and provides operating guidance to meet federal, state, and Army requirements for pollution prevention and an Environmental Management System (EMS), which integrates pollution prevention into the functional framework of the installation. These approaches support the ideal of environmental sustainability – maintaining operations and activities without harm to the environment.

O-2. General.

- a. Pollution Prevention.
- (1) Is any reasonable mechanism or method to successfully avoid, prevent, or reduce pollutant discharges or emissions other than by the traditional method of treating pollution at the discharge end of a pipe or stack.
- (2) Is a proactive environmental management approach addressing the elimination and/or reduction of all types of waste as well as natural resource conservation; use of sustainable design and development; and can be implemented at any stage of the pollution management hierarchy.
- (3) Is the Army's preferred approach to environmental management and maintaining compliance with environmental laws and regulations.
- (4) Fosters sustainability to support the viability of Army training platforms, installation infrastructure, and the needs of the surrounding community.
 - b. Federal Pollution Prevention Policy Documents.
- (1) The Pollution Prevention Act of 1990 establishes a national policy that "pollution should be prevented or reduced at the source whenever feasible." The Pollution Prevention Act establishes the waste management hierarchy of source reduction, recycling, treatment, and then disposal.
 - (a) Source reduction has the highest priority in the hierarchy.
 - (b) When source reduction cannot be achieved, recycling and reuse are preferred over treatment.
- (c) When treatment is not possible, <u>environmentally sound</u> disposal is used as the last option, after all other options have been exhausted.
- (2) Other federal laws promote pollution prevention by establishing stringent requirements for the management of hazardous materials (HM), solid waste (SW), universal waste (UW), and hazardous waste (HW). These requirements strongly support the implementation of pollution prevention initiatives to minimize the amounts of material or waste managed and thereby reduce the burdens imposed by the laws. These laws and their pollution prevention aspects include:
 - (a) Clean Water Act (CWA): Reduce and eventually eliminate the discharge of pollutants into waterways.
 - (b) Clean Air Act (CAA): The amendments of 1990 added pollution prevention as a primary goal of the Act.
- (c) Resource Conservation and Recovery Act (RCRA): The hazardous and solid waste amendments of RCRA established as national policy the reduction or elimination of HW generated whenever possible.

- (d) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA): Indirectly supports pollution prevention through its liability provision. Any mismanagement of HM can result in liability and consequent enforcement action by a regulating agency.
- (e) Emergency Planning and Community Right-to-Know Act (EPCRA): Minimization of hazardous substance usage is an EPCRA goal. The Act promotes pollution prevention by requiring facilities meeting reporting criteria to report on the physical and chemical hazards, amounts, locations, and methods of storage for hazardous chemicals stored, and to report annually on toxic releases to the environment.
- (3) Executive Order 13101, 14 September 1998, Greening the Government Through Waste Prevention, Recycling and Federal Acquisition, directs federal agencies to improve waste prevention, recycling and the purchase and use of recycled content and environmentally preferable products and services.
- (4) Executive Order 13148, 21 April 2000, Greening the Government Through Leadership in Environmental Management, directs Federal agencies to ensure all necessary actions are taken to integrate environmental accountability into agency day-to-day decision making and long-term planning processes, across agency missions, activities, and functions.
- c. The Army Pollution Prevention Program. It is outlined in HQDA LTR 200-94-1, Army Pollution Prevention Program, 19 January 1994. The letter establishes Army policy and goals, and assigns responsibilities for management of the Army pollution prevention program, so as to reduce the reliance on products or processes that generate environmentally degrading impacts to as near zero as possible. The following policy provisions of the document affect Fort Eustis:
- (1) Reduce total Army releases of toxic pollutants to the environment (and off-site transfers for treatment and disposal) by no less than 50 percent by 31 December 1999, from a baseline established not later than December 1994. DOD will update these goals when DOD finalizes its list of 15 toxic chemicals to be reduced by 50% by 31 December 2006.
- (2) Conduct multi-media pollution prevention assessments and establish pollution prevention plans at all Army installations. Establish multi-media programs to implement the pollution prevention plans.
 - (3) Emphasize the procurement of non-hazardous rather than hazardous materials whenever practical.
 - (4) For all Army requirements, favor the use of recycled materials in accordance with Executive Order 13101.
- (5) Place continued emphasis on increasing the percent/amount of recyclable material diverted from the municipal waste stream.
 - (6) Accomplish pollution prevention reporting in accordance with Executive Order 13148.
- (7) Incorporate pollution prevention and sustainability principles into Army activities, including the following, to the greatest extent possible:
 - (a) Operations and training.
- (b) All phases of contingency operations: mobilization, deployment, operations, redeployment, and demobilization.
 - (c) Logistical activities (supply, maintenance, transportation, facilities, and services).
 - (d) Planning, construction, renovation, and demolition throughout the infrastructure life cycle.
 - (e) Base operations and installation support activities.

- (f) Health and medical activities.
- (g) Energy plans and programs.
- (8) Include Pollution prevention in the installation Mis sion Essential Task List (METL) and/or core competencies.
- d. The Fort Eustis Pollution Prevention Plan was prepared in accordance with Executive Order 13148. Oversight for Plan implementation is provided by the DPW-ENRD. The Plan is maintained by the Environmental and Natural Resources Division (ENRD), Public Works (PW) and updated as required.

Q-3. Pollution Prevention Policy and Pollution Reduction Goals.

- a. It is Fort Eustis policy to:
- (1) Foster pollution prevention and sustainability awareness and seek pollution prevention opportunities throughout Fort Eustis and its sub-installations in all mission areas.
- (2) Minimize the quantities of hazardous or environmentally unacceptable materials requisitioned, stored, and used.
- (3) Systematically reduce or eliminate use of HM, operations and processes that produce HW and environmentally harmful emissions.
- (4) Comply with the applicable provisions of the Pollution Prevention Act, EPCRA, Executive Orders 13101 and 13148 and other applicable federal guidance; and the Army Pollution Prevention Program.
 - b. Pollution Prevention Reduction and EMS Goals.
- (1) DOD has established a new Measure of Merit that requires Fort Eustis to set a pollution reduction goal for non-hazardous solid waste to ensure a greater than 40% diversion rate by the end of FY 2005. This goal will be attained while ensuring integrated non-hazardous solid waste management programs provide an economic benefit when compared with disposal using landfill and incineration alone
- (2) ENRD and installation representatives from designated activities will establish performance goals for major Fort Eustis processes/programs. These goals will be documented in the Fort Eustis Pollution Prevention Plan, disseminated to the EQCC for management review, and updated as appropriate.

Q-4. Responsibilties.

- a. The Commander, U.S. Army Transportation Center and Fort Eustis will:
- (1) Chair the Environmental Quality Control Committee to function as a management tool for implementing environmental management system and sustainability concepts throughout the installation.
- (2) Emphasize the importance of integrating pollution prevention and EMS as part of daily work routines and "Best Business Practices" into installation goals, objectives and vision statements.
- (3) Function as the Senior Approving Official (SAO) for requisitions and contracts requiring the procurement and/or use of Class I ozone-depleting chemicals (ODCs) for which there is no acceptable substitute. The ODC management program is discussed in Appendix O of this regulation.

b. The Fort Eustis Garrison Commander (GC) will incorporate pollution prevention and/or sustainability concepts into the installation Core Competencies/Mission Essential Task List (METL).

c. The DPW will:

- (1) Have staff proponency for the installation pollution prevention program, and will execute the program through the Environmental and Natural Resources Division (ENRD).
- (2) Insure that MSDSs for HM to be used by JOC/Griffin Services and other DPW contractors is coordinated through the DPW-ENRD for approval and that this is specified in contracts.
- (3) Insure that DPW credit card holders do not procure HM. It must be procured through the Fort Eustis Hazmart. At Fort Story, activities will obtain HM through the Little Creek Hazardous Material Minimization Center. See TCFE Reg 700-1 for more detail.
- (4) Foster pollution prevention awareness and actions in DPW operations, with emphasis on identifying P2 opportunities in design, new construction, renovation and demolition activities by using the Sustainable Project Rating Tool (SPIRIT) criteria developed by the Corps of Engineers.
- (5) Establish baselines, performance goals and assess annual progress toward goal attainment as part of the EMS and installation sustainability program in the following:
 - (a) Solid waste reduction.
 - (b) Energy consumption.
 - (c) Reduction in HM use.
 - (d) Reduction in HW generation.
 - (e) Pesticide use.
 - (f) Air emissions.
 - (g) Water consumption.
 - (h) Recycling.
 - d. The ENRD will:
 - (1) Provide the Installation Pollution Prevention Coordinator/Environmental Management System coordinator.
- (2) Maintain the U.S. Army Transportation Center and Fort Eustis Pollution Prevention Plan and coordinate execution of the Plan.
 - (3) Develop and conduct annual pollution prevention/EMS training.
- (4) Maintain the Pollution Prevention Database which tracks usage of hazardous materials, to include Section 313 chemicals, ODCs, and Hazardous Air Pollutants
 - (5) Review MSDSs for products proposed for purchase by installation activities
 - (6) IAW the Pollution Prevention Plan:

- (a) Review annual inventories of HM storage and use, HW reduction, and changes in processes.
- (b) Collect quarterly data on HM storage and/or use from Fort Eustis and Fort Story Hazmarts and installation units/agencies.
 - (c) Conduct a biennial evaluation and prepare a progress report on pollution prevention/EMS goal attainment.
- (d) Track all types of pollution prevention equipment, to include, but not limited to parts washers, solvent sinks, and HM recycling equipment.
- (7) Prepare Toxic Release Inventory (TRI) and Tier II reports required under EPCRA, and other reports required by Army, state, and federal regulations.
- (8) Coordinate implementation of EMS/Sustainability concepts in installation management to include service, maintenance, repair, and construction contracts.

e. The DOL will:

- (1) Manage the Hazardous Material Program IAW TCFE Reg 700-1, Hazardous Material Management Program. Insure that only HM which is on individual established AULs is requisitioned for supply and distribution to Fort Eustis users.
 - (2) Insure that installation credit card holders do not use these cards to procure hazardous materials.
- (3) Foster pollution prevention awareness and actions in DOL operations, with emphasis on installation vehicle/aircraft maintenance and painting activities. Ensure workers follow appropriate SOPs to ensure equipment such as paint booths, blast facilities, and solvent sinks function properly.
 - f. The Northern Region Contracting Center Installation Division will:
- (1) Ensure that contracts and requisitions processed through the DPC for approval, if requiring the use of HM, are coordinated through DPW-ENRD.
- (2) Emphasize the procurement during credit card holder training of material containing the maximum post-consumer recycled content practicable and those products which are designated as environmentally preferable products as required by the Affirmative Procurement Program (Executive Order 13101 and Executive Order 13148).
- (3) Coordinate with DPW –ENRD to ensure that all FAR clauses related to environmental management are included in all contracts.
 - g. The Commander, MAMC will:
 - (1) Foster pollution prevention awareness and actions in health and medical activities.
- (2) Develop pollution prevention performance goals for medical activities and coordinate the goals with the ENRD.
- h. Commanders/directors of installation and tenant organizations that store and/or use HM or generate HW in the course of performing their operational mission will:
 - (1) Foster pollution prevention awareness and action through:
- (a) Compliance with the requirements in paragraph 5, Pollution Prevention Actions, below, and periodic assessment of processes for opportunities to modify or replace the process so as to reduce the use of HM and/or the generation of SW and/or HW.

- (b) The requisition and use of only HM which is on their individual unit/activity AUL.
- (2) Submit the Quarterly Hazardous Material Inventory and Munitions Expenditure Report, using the procedures in Appendix G Hazardous Material Management, this regulation.
- **Q-5. Pollution Prevention Actions.** The actions described below are major aspects of the Fort Eustis Pollution Prevention Plan. Compliance with applicable requirements is mandatory for all organizations and personnel on Fort Eustis and its sub-installation. Additional details are available from the Installation Pollution Prevention Coordinator (878-4123, ext 299).
- a. Authorized Use List (AUL). The AUL is a listing of HM approved for use in processes at Fort Eustis and its sub-installations. Only HM on the AUL will be used and requisitioned. Each unit/activity will have an AUL established for use in their specific processes. The AUL is subject to frequent modifications and will have HM added and deleted as approved by ENRD. See TCFE Reg 700-1, Hazardous Material Management Program for more information.
 - b. HM procurement. Each Command and/or installation or tenant activity procuring hazardous materials will:
 - (1) Follow the procedures in TCFE Reg 700-1, Hazardous Material Management Program.
- (2) If the Hazmart was not used for procurement of the HM (some compressed gases may not be carried by Hazmart), provide a quarterly report to the EPCRA Program Manager at ENRD. The report will detail HM procured during the quarter (including local purchase), to include item description, quantity, and cost.
- c. Pollution Prevention (P2) Equipment. All installation units/organizations will provide an update to a biennial inventory of pollution prevention equipment, to include, but not limited to, parts washers, solvent sinks, bulk fluid distribution units, drive on containment systems, and recycling units, with the DPW-ENRD. The inventory documents the P2 equipment used by the installation.
- d. RCRA 6002. Annual reporting for RCRA 6002 for coolant recycled, re-refined oil purchased, and retread tires procured. If applicable, each Command, activity, and /or tenant (USATSCH, DOL (Hazmart). DPCA, 7th Group, USAALS, 8th Bde, 99th RSC) will maintain records of above items procured during the CY using reporting forms provided by ENRD.
- e. Affirmative Procurement. This program directs the use of recycled content products, environmentally preferable products, and bio-based products when available and cost effective. Appendix S provides more detail about affirmative procurement.
- f. EMS. Designated activities will participate in an annual goals setting session for EMS. They will also participate in work teams which will recommend improvements in work processes or programs which will improve mission accomplishment through awareness of the environmental impacts of processes and programs.

Q-6. Pollution Prevention Training.

- a. ENRD will incorporate pollution prevention awareness and principles in the following scheduled training courses:
- (1) Basic, Intermediate, and Advanced Environmental Management Courses for Activity Environmental and Hazardous Waste Coordinators
 - (2) Recycling Coordinator Course
 - (3) Environmental Management System Course

- (4) Officer and NCO Professional Development Course.
- b. Commanders/directors of assigned and tenant organizations that store and/or use HM or generate SW and/or HW in the course of performing their operational mission will conduct recurring awareness training to promote and encourage pollution prevention. Briefing materials and other technical assistance are available from the Pollution Prevention Coordinator (878-4123, ext 299).

Appendix R

Solid Waste Management

R-1. Purpose. This appendix establishes policies and procedures for integrated solid waste management in order to comply with Federal, State, and Army regulations and to satisfy contractual requirements.

R-2. References.

- a. Resource Conservation and Recovery Act (RCRA) of 1976
- b. Executive Order 13101
- c. Army Regulation 420-49
- d. Army Regulation 200-1
- e. DA Pam 200-1
- g. Fort Eustis Environmental Website

https://dpw-web.eustis.army.mil/ENRD/ENRDHome/Index.htm

R-3. Background.

- a. The Environmental and Natural Resources Division (ENRD), Directorate of Public Works (DPW) is responsible for oversight of the solid waste management program at Fort Eustis and Fort Story. ENRD, DPW ensures that the installation is in compliance with Federal, State, and Army regulations that govern the management of solid waste. This pamphlet applies to all solid wastes except for hazardous, special, radioactive, and infectious wastes. Personnel with questions regarding these types of wastes should refer to Tab 1 of this Appendix to locate the proper points of contact (POCs) and references.
- b. ENRD, DPW uses an integrated approach to managing solid waste, emphasizing pollution prevention as the governing strategy. This strategy has been a key part of Federal regulations governing solid waste since Congress passed the Resource Conservation and Recovery Act (RCRA) in 1976 and clarified the prevention concept in the Pollution Prevention Act (PPA) of 1990. The premise of the PPA is to reduce waste at the source, therefore avoiding the need for disposal. When source reduction cannot be accomplished, reuse and recycling should be implemented. Treatment and disposal are the least desirable options and should be considered only when source reduction, reuse, and recycling are not feasible. The integrated approach is further developed in Executive Orders 13101 and Federal procurement regulations that further RCRA's requirement for the Federal government to develop and sustain markets for products made from recycled materials. This affirmative procurement requirement ensures a market for materials diverted from the solid waste stream through recycling. The Command followed up by making affirmative procurement an installation policy in TCFE 715-1, which is now included in Appendix QQ.

R-4. Definitions.

- a. <u>Solid Waste</u> means any discarded material including materials that are abandoned, recycled, reclaimed, or accumulated speculatively. The term "Municipal Solid Waste" will be used throughout the document to define solid waste as trash, not including hazardous waste or any other solid waste requiring special handling.
 - b. Waste Diversion means removing materials from the waste stream through reuse or recycling.
- c. Waste Stream refers to materials that have outlived their useful lives and are destined for disposal or recycling. The waste stream definition found in the HMWM SOP refers only to hazardous wastes.
- d. <u>Special Solid Waste</u> means a solid waste (excluding hazardous waste) that is difficult to handle and/or requires special precautions because of hazardous properties or the nature of the waste creates waste management problems in normal operations. These items cannot be discarded in dumpsters.

- e. <u>Hazardous Waste</u> means a solid waste that poses a potential hazard to human health or the environment when not properly managed due to its ignitable, corrosive, reactive, or toxic properties.
- f. <u>Recyclable</u> means the series of activities, including collection, separation, and processing, by which products or other materials are recovered from the solid waste stream for use in the form of raw materials in the manufacture of new products other than fuel for producing heat or power.
- g. <u>Qualifying Recycling Program</u> means a managing activity designated by the Installation Commander that has initiated procedures for segregation and collection of specifically named recyclable materials from the waste stream. The managing activity will maintain records of the quantity and type of material sold.

R-5. USATC Integrated Solid Waste Management Policy.

a. <u>Goal</u>: It is the policy of the USATC to exceed the Federal goal of diverting a minimum of 35% of the installation's municipal solid waste and to meet the Department of Defense's goal of diverting 40% of the installation's solid waste by the year 2005. Total municipal solid wastes include those items destined for disposal or recycling. Total municipal solid wastes do not include hazardous, special, radioactive, or infectious wastes. The benefits of this policy include reduced disposal costs, greater energy savings, less landfill space used, greater value of materials salvaged, and less impact on global warming.

R-6. Solid Waste Management Facilities.

- a. ENRD operates the Solid Waste, Recycling, and Pollution Prevention Center (SWRPPC) in Building 1209 at Fort Eustis to support integrated solid waste management. Fort Story operations are managed through the Fort Eustis SWRP2C in Building 1053. ENRD also operates the Fort Eustis Hazardous Waste Accumulation Facility, Building 1207 and the Fort Story Hazardous Waste Accumulation Facility, Building 1011.
- b. The Solid Waste, Recycling, and Pollution Prevention Center (SWRPPC) is compassed of three work sections. The <u>Solid Waste Section</u> oversees and coordinates functions such as coordination of dumpster and mobile toter pick-ups for administrative offices and family housing. It also manages waste which cannot be placed in dumpsters or toters such as tires, broken pallets, aerosol cans, items larger than 3' X 3', metal cans and drums, fluorescent light bulbs, mattresses, furniture, and yard waste. The hours of operation for the Solid Waste Section are Monday-Friday, 0700-1530 except Federal holidays.
- c. The Recycling Section is located in Building 1209 and is the repository for items that the installation sells for recycling. It serves as the drop-off point for aluminum cans, aluminum foil, computer paper, white ledger paper, colored paper, magazines, junk mail, newspapers, tin/bi-metal cans, and metal. The hours of operation for the Recycling Section are Monday-Friday, 0730-1630 except Federal holidays. Fort Story recycling operations are performed under contract with the Southeastern Public Service Authority (SPSA). The Fort Story Recycling Facility, Building 1053 is open Monday-Friday from 0900-1600. This coincides with the collection of recyclables at Fort Story by SPSA and occurs every other Tuesday
- d. Pollution Prevention Section is also located in Building 1209. It provides several centralized functions such as drum/oil filter crushing, puncturing of aerosol cans, and the crushing of fluorescent light bulbs. It also recycles antifreeze for those units, which generate small quantities and do not find it cost effective to operate their own recycling machine. This section also operates the Household Chemical Exchange Center which opened in July 2002. See Chapter 4, Section c for more information.
- e. Yard Wastes. All yard wastes at Fort Eustis must be brought to Building 1209 for disposal. Yard wastes are leaves, grass clippings, and branches less than 3ft long and ½ inch in diameter. Yard wastes must be brought to Building 1053 at Fort Story.
- f. The Hazardous Waste Accumulation Facilities (HWAFs) are located in Building 1208 at Fort Eustis and Building 1011 at Fort Story, See Appendix H for disposal of Hazardous Wastes, Non-Hazardous Wastes, Universal Wastes, and selected special solid wastes. Fort Eustis HWAF hours of operation are Monday-Friday, 0800-1500 hrs

except Federal holidays. Fort Story hours of operation vary with requirements. Fort Story personnel should coordinate turn-ins by calling the Fort Eustis HWAF at 878-3915.

R-7. Solid Waste Disposal.

- a. Dumpster Management. The installation solid waste contract provides dumpsters located near all buildings for municipal solid waste that exceeds the volume of individual trash receptacles serviced through the custodial contract. These dumpsters are funded by the installation operations and maintenance account, therefore they are intended only for municipal solid waste generated on Fort Eustis or Fort Story. It is against the law (18 USC 641 for civilians, Article 134 UCMJ for military) for personnel to dispose of wastes not generated on the installations.
- b. Items Appropriate for Du mpster Disposal. Attachment TAB 2 provides a comprehensive list of various types of solid waste items, disposal location for each item, and a POC. Items that are considered waste, but are not included in any of special categories listed in sections c and d, may be placed in the dumpster. These include: containers contaminated with food, plastics (#3 or above) and glass (FE only), wax or plastic coated paper, cigarette or cigar butts, styrofoam, and cellophane.
- c. Some items may go into the dump ster if they are broken down in pieces smaller than 3' by 3'. Personnel should ensure that items placed in dumpsters are expendable items. No hand-receipted items should be placed in dumpsters.
- d. Items Prohibited from Dumpster Disposal. Certain items should not be placed in dumpsters. Federal and State regulations govern the disposal of any:
 - Hazardous Waste
 - Special Solid Waste
 - Medical Waste
 - Radioactive Waste

These items should never be placed in a dumpster. For a more complete list of wastes in these categories, see Attachment TAB 1.

ITEMS NOT APPROPRIATE FOR DUMPSTER DISPOSAL

- Containers contaminated with food
- Plastics (3 or above) and glass (FE only)
- Wax or plastic coated paper
- Cigarette or cigar butts
- Styrofoam
- Cellophane
- e. There are other items that cannot go into the dumpster because of contractual issues.
- Items larger than 3' by 3'
- Liquids
- Dead animals
- Biomass (yard clippings, limbs, pet wastes)
- Items with special disposal requirements
- Industrial (Construction debris, concrete, wood pallets, etc,)?
- f. Refusal To Dispose of Dumpster Contents. The Installation Solid Waste Manager (ISWM) monitors the post dumpsters to ensure compliance with Federal, State, Army, and contractual requirements. In keeping with all regulations as well as integrated solid waste management goals, the ISWM may decline to dispose of the contents of dumpsters containing hazardous wastes, liquids, an excessive volume of recyclables or other items listed in Attachments A and B. In this event, the ISWM will contact the ARC to coordinate the removal of prohibited items from the dumpster.
- g. Items managed by the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center or the Fort Story Recycling Center (see next section) do not belong in the dumpster.

R-8. Solid Waste Recycling, Fort Eustis.

a. Materials Recycled. The Solid Waste, Recycling, and Pollution Center accepts deliveries of the following items:

Paper* - computer paper copier paper, white ledger paper, newspapers, manuals, telephone books, cardboard, magazines, notepaper, manila/file folders, brown grocery bags, and junk mail.

Other Items - aluminum cans*, tin cans (rinsed), #1and #2 plastics, aluminum foil, scrap metal (including appliances with refrigerant which has been removed by a certified technician.

- * These items are picked up from the administrative offices by the recycling staff. If aluminum cans are picked up, units will not receive reimbursement for the sale of the metal. Reimbursement for aluminum cans occurs if units bring them directly to the facility.
- b. Pickup Procedures. Personnel from the Recycling Center pick up paper items from administrative areas at Fort Eustis. They will also pick up aluminum cans that are donated to the center. Units and organizations that have vehicles are required to deliver recyclables to the recycling center. Activities without vehicles may request a regular pickup by calling the Recycling Center at 878-2692. Pickups are automatically scheduled according to geographic areas for activities that do not have vehicles appropriate for delivery of recyclables. Special pickups may be available on demand for special events, such as Earth Day, Clean Your Files Day, or America Recycles Day.

PAPER AND PAPER PRODUCTS SUITABLE FOR RECYCLING

Computer Paper

Cardboard/Small

Boxes

Copier Paper

Magazines

White Ledger Paper

Notepaper

Newspapers

Manila/File

ITEMS SUITABLE FOR RECYCLING

Aluminum Cans*

Magazines*

Tin/bi-metal cans (rinsed) #1 and #2 Plastics Aluminum Foil Scrap Metal (including appliances with refrigerant properly captured) Telephone Books* White Paper* Colored Paper*

- c. Delivery Procedures. Any item considered acceptable for recycling (see Tables above) may be delivered to Building 1209. Newspapers, magazines, paperboard, tin/bi-metal cans, aluminum cans, aluminum foil/pie plates, #1 and #2 plastics, and cardboard may be placed in the self-service area of the Recycling Center, located on the left of the service entrance. Computer paper, high-speed copier paper, colored paper, mixed paper, TMs, and FMs may be brought to the main area of the Recycling Center.
- d. Scrap Metal and Appliances. Personnel must check in with Recycling Center staff prior to unloading metal. Appliances containing refrigerants must use the procedures in Appendix O.

R-9. Solid Waste Recycling, Fort Story.

a. Recycling Center and Materials Recycled. Personnel from the Southeastern Public Service Authority (SPSA) pick up recyclable items from administrative areas on Fort Story. Activities that have questions regarding what is recycled may call Tel. 878-4232. Fort Story has a Recycling Center for receiving metal, pallets and yard waste. It is located at Building 1053 and will be opened Monday-Friday from 0900-1600 hours, Tel 422-7634.

PAPER AND PAPER PRODUCTS SUITABLE FOR MOBILE TOTER (PAPER)

Computer Paper Small Boxes Copier Paper Notepaper Newspapers Manuals Colored Paper Cardboard

Telephone Books

- b. Pickup Procedures. SPSA collects recyclables from administrative offices on Fort Story every other Tuesday. Pickup for special events, such as Earth Day, Clean Your Files Day, or America Recycles Day, may be coordinated through the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center, Building 1209, Tel 878-4232.
- c. Mobile Toter Management. Each activity, which recycles, has at least one assigned mobile toter for paper and paper products. An additional toter may be issued on request through the, Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center, Building 1209, Tel. 878-4232 or e-mail mantoothw@eustis.army.com. The 95-gallon collection containers should be placed in the designated collection location by 0700 every other Tuesday. Mobile toter #1 should contain only paper and paper products newspapers, phone books, and all colors/grades of paper. All office paper must be bagged in clear plastic bags. Mobile toter #2 should contain co-mingled recyclables, which may only include aluminum cans and foil, glass (brown, clear, green) bottles and jars, #1 and #2 plastic bottles and containers, and tin/steel cans. Each mobile toter must be clearly marked as to which items it contains. Overflow can be placed in clear plastic bags. All bottles, cans, etc., should be thoroughly rinsed before placing in recycling bins or toters.
- d. Cardboard. Cardboard, except in small quantities, should be placed in a special beige-colored outside container. Recycling Coordinators for activities that generate large amounts of cardboard may request a cardboard container from the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center, Tel. 878-4232.
- e. Delivery Procedures. Metal should be delivered to the Fort Story Recycling Center, Building 1053, between 0900-1600 hrs, Monday Friday. All metal must fit into the 30 cubic yard container provided. Metal larger than 4' x 8' must be cut into pieces small enough to fit the 30 cubic yard container in the recycling yard. For drop-offs between collection days, personnel should call Post Operations, Tel. 422-7101, extension 233.
- f. Scrap Metal and Appliances. Large items of scrap metal must be delivered to the Recycling Center. Personnel must provide documentation that all refrigerant has been properly recovered from appliances. The recycling operation at Fort Story will not accept any appliances that may contain refrigerant without documentation of proper recovery by a certified technician.

ITEMS SUITABLE FOR MOBILE TOTER (COMINGLED)

Aluminum Cans and Foil
Tin/Steel Cans
#1 and #2 Plastics
Brown, Green, Clear, and Blue
Glass
Scrap Metal (small items)

PROHIBITED ITEMS FROM RECYCLING BINS

- Coffee Grounds
- Ashes
- Asphalt Impregnated Paper
- Waxed Paper
- Plastic Coated Paper
- Computer Software
- Photographs
- Cigarette/Cigar Butts
- Metal and Plastic Binders
- Hazardous Materials
- Plastics #3 and above

R-10. Solid Waste Recycling - Other Information.

- a. Contaminants. Contaminants are any items or materials placed with recyclables that should not be there. Occasionally some contaminants may render the recyclables uncollectible, such as residue from food or glue. Other times, the recyclables will not be collected because a majority of items are not accepted by the Recycling Center. **Avoid placing inappropriate items such as food, photos, cigarette/cigar butts, metal binders, and hazardous materials within recycling containers.** If in doubt, please call the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center at 878-2692.
- b. Aluminum Cans. Aluminum cans have been declared non-Government property. The Fort Eustis Recycling Center pays individuals (civilians and military) and military units for aluminum cans when cans are collected and brought to the Recycling Center. Individuals are paid in cash for the cans. Units are given a receipt each time aluminum cans are turned in and the money accumulates in an account maintained for each unit at the Recycling Center. This money can be drawn by the unit anytime the Commander or First Sergeant desires it for use in the

organization, or can be allowed to accumulate for later use. It is that organization's money, not a unit fund that any unit can request to draw from.

c. Classified or Sensitive Material. Activities with sensitive material, information subject to the Privacy Act, and/or classified material should coordinate with DPTMSEC Security Division prior to recycling paper. The Recycling Center is not cleared for the destruction of classified documents. These should be destroyed IAW AR 380-5 and turned in to the Recycling Center.

R-11. Activity Recycling Areas.

- a. Each Activity to include subordinates will establish recycling areas which are designated and centralized for each general work area. The ARC shall work with Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center Manager to develop the most efficient configuration based on the number of people located within the work area. A work area may be a building or some portion of a building that houses personnel who work for the same activity. The ARC may request additional storage bins to enhance participation in the recycling program.
- b. Each Recycling Area will be managed by an appointed and trained Recycling Coordinator (RC). See Appendix C of this regulation for training requirements.
- c. <u>Education and Awareness</u>: ENRD, DPW is responsible for oversight of the integrated solid waste management program for the USATC. As part of program management and in support of this policy, ENRD will disseminate up-to-date solid waste management information. This includes information concerning dumpsters, recycling, construction/demolition debris, and other municipal solid waste issues. In compliance with the general policy outlined above, all installation activities shall follow procedures listed in this pamphlet.

R-12. Solid Waste Disposal and Recycling - Family Housing.

a. Fort Eustis. Recyclables & Municipal Solid Waste are collected from family housing areas every Wednesday.

Deviations from this schedule due to holidays or inclement weather will be announced in advance via electronic mail, flyers, The Wheel, or other public media. Attachment Tab 3 also provides this schedule.

NOTE: A new Fort Eustis Solid Waste contract will be in effect in early CY 2003. The new contract may result in changes to the above schedule and types of items picked up by the contractor. ENRD will provide updates when the new contractor is selected.

- b. Fort Story. Household trash is collected from family housing areas every Tuesday. Household recyclables are collected from family housing areas every other Tuesday. Contractors collect both household trash and recyclables. Attachment Tab 3 also provides this schedule.
- c. Household Hazardous Waste Reuse or Disposal. Some hazardous household products may still be useful and reused. These products may be brought to the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center, Building 1209 or the Southeastern Public Service Authority's Oceana District Drop Site, located at 2025 Virginia Beach Boulevard, near the west gate at Fort Story as part of the Household Chemical Exchange. Only products generated from households on Fort Eustis or Fort Story are eligible for this program. Please refer to Attachment TAB 4 for more information. Examples of the types of products accepted for reuse include:
 - Household maintenance products, like rust preventatives, paint, and paint thinners.
 - Household cleaning products, like drain cleaners, bleach, glass cleaner, and waxes.
 - Lawn and garden products, like fertilizers, herbicides, insect spray and pool chemicals.
 - Automotive products, like gasoline, motor oil, diesel fuel and carburetor cleaner.
 - Miscellaneous items like photo chemicals, mothballs, compressed gas cylinders and aerosols.

d. No wastes generated from industrial, administrative, or barracks areas will be accepted. These wastes must go through the Hazardous Waste Accumulation Facility, Building 1208 at Fort Eustis and Building 1053 at Fort Story. Please refer to Appendices H of this regulation for information on the management of non-household hazardous wastes.

R-13. Outreach Event Participation.

- a. ENRD, DPW provides the opportunity for increased awareness through several annual events. Activities are encouraged to participate in these events, as well as to plan activity-specific events that provide solid waste management information to personnel.
- b. American Recycles Day (ARD). ARD is held annually in late October or early November. This is a national event, sponsored by the United States Postal Service, the Environmental Protection Agency, Home Depot, and other corporate sponsors.
- c. Earth Day officially occurs on 22 April. The installation usually holds a weeklong series of events near that date that focus on various aspects of environmental protection. An annual awards ceremony is also held as part of the Earth Week event. ENRD, DPW takes this opportunity to recognize activities and individuals who have made a significant contribution to environmental management during the previous year.
- d. Clean Your Files Day. Clean Your Files Day is a national event held during Earth Week. The event, sponsored by the US Conference of Mayors, encourages personnel to recycle paper that has accumulated in files during the year.
- e. Other outreach tools. Videos, magnets, brochures and flyers are available from ENRD to help you promote responsible solid waste management.

R-14. Installation Activity Responsibilities.

- a. Directorate of Public Works, Environmental and Natural Resources Division:
 - (1) Manages the Integrated Solid Waste Program at Fort Eustis and Fort Story.
 - (2) Performs day-to-day recycling and solid waste operations.
 - (3) Provides training for Activity Recycling Coordinators (ARCs).
 - (4) Maintains statistical data on the recycling and solid waste operations.
 - (5) Promotes affirmative procurement to activity personnel.
- (6) Ensures that all new contracts awarded on Fort Eustis include recycling clauses stipulating to contractors' disposition of recyclable materials, particularly construction/destruction contracts, when feasible and cost advantageous to the government.
 - b. Directorate of Personnel and Community Activities:
- (1) Provides NAF workers for the Recycling Center. Note: The new Fort Eustis Solid Waste Contract, starting in CY 2003, may eliminate this requirement.
 - (2) Coordinates with ENRD to ensure that all DPCA-sponsored events have recycling containers.
 - (3) Appoints ARCs as outlined in Section 3-1a and ensures that they receive training from ENRD.
 - c. Directorate of Logistics:

- (1) Ensures that recyclable materials not processed by the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center, such as batteries, computers, and compressed gas cylinders, are recycled.
- (2) Continues to process and turn in ammunition brass and other range residue to the Defense Reutilization and Marketing Office (DRMO). In addition to the certification required stating that the material is inert, the recycling stamp, as shown below will also be placed on all copies of the turn-in documents:

QUALIFYING RECYCABLE MATERIAL SALE PROCEEDS TO 21F3875.1111S4401900000687323CRCYCLE006146398004

Placing the above stamp on all documents ensures that the funds are returned to the installation and not placed in a DOD Fund.

- (3) Ensures that all documents processed for the DRMO are stamped with the recycling stamp, regardless of whether the item has been classified unserviceable by DRMO or if DRMO directs that the items be sold as scrap.
- (4) Provides temporary forklift support to the Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center on a non-reimbursable basis upon request during delayed repairs of assigned equipment.
- (5) Provides a monthly report with document number, type and amount of materials turned in as recyclables NLT the 5^{th} of each month.
 - (6) Appoints AECs/ARCs as outlined in Section 3-1a and ensures that they receive training from ENRD.
 - d. Directorate of Information Management:
- (1) Develops procedures to ensure recyclable communication wires, cables, etc., and other materials that could be separated are turned in to the DOL Supply Division Central Collection Point.
- (2) Ensures that the Postal Service and Post Locators use the Recycling Center and follows all procedures set forth in this pamphlet.
 - (3) Appoints AECs/ARCs as outlined in Section 3-1a and ensures that they receive training from ENRD.
 - e. Directorate of Peninsula Contracting:
- (1) Ensures that all new contracts awarded on Fort Eustis include recycling clauses stipulating to contractors disposition of recyclable materials, particularly construction/destruction contracts, when feasible and cost advantageous to the government.
 - (2) Appoints AECs/ARCs as outlined in Section 3-1a and ensures that they receive training from ENRD.
 - f. Major Subordinate Commanders, Base Operations and Tenant Activities:
- (1) Assign responsibilities to a staff section or directorate to coordinate, direct and oversee the organization's recycling program.
- (2) Establish guidelines and procedures to ensure that all subordinate units/activities properly manage solid waste, including participation in the recycling progra m.
- (3) Ensure that all AECs/ARCs are appointed as outlined in Section 3-1a and that they receive annual training.

- (4) Units and organizations with vehicles are required to deliver their recyclable materials, separated by type, to the recycling center at Fort Eustis. Staff sections and directorates on scheduled pickup will separate their material by type and not mix recyclable materials with trash and other contaminants. In the event the recycling center is backlogged and cannot make scheduled pickups on a timely basis, it is the responsibility of designated ARC to make arrangements to have the recyclable material delivered to the recycling center or stored in some predetermined location until the recycling personnel are able to return to normal schedule.
- (5) Ensure that personnel do not discard recyclables in the dumpster. The installation must pay for items discarded in the dumpster, but receives monies for the sale of recyclables.

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Tab 1 Appendix R HAZARDOUS, SPECIAL, RADIOACTIVE, AND MEDICAL WASTES

COMMON HAZARDOUS WASTES AT FORT EUSTIS AND FORT STORY
Solvents with low flash points
Mercury
Paint and Paint Related (Oil-Based, Lead or CARC)
Blast Grit
These are UWs
Pesticides
OBA (Oxygen Generating Canister)
Calcium Hypochlorite
Adhesives
Fuel Filters contaminated with gasoline
Dry sweep contaminated with gasoline
Absorbents contaminated with gasoline
Lead-Based Paint

Hazardous wastes must be managed in accordance with Appendix H by trained AECs and HWCs. Questions concerning the management and disposal of these wastes should be directed to the HWAF, 757-878-3915 or DPW-ENRD, 878-4123, extension 293.

WEBSITE: https://dpw-web.eustis.army.mil/ENRD/ENRDHome/Index.htm

COMMON SPECIAL SOLID WASTES AT FORT
EUSTIS AND FORT STORY
Used Oil
Filters (All types)
Antifreeze
Asbestos
Non-Hazardous Wastes (NHW) Examples include
latex paint, absorbents contaminated with petroleum.

Universal Wastes, batteries and lamps to include fluorescent bulbs

The special solid wastes listed above must be managed in accordance with the Appendix H by trained AECs and HWCs.

Questions concerning the management and disposal of these wastes should be directed to the HWAF, 878-3915 or DPW-ENRD at 878-4123, extension 293.

WEBSITE: https://dpw-web.eustis.army.mil/ENRD/ENRDHome/Index.htm

COMMON RADIOACTIVE WASTES AT FORT EUSTIS AND FORT STORY

Smoke Detectors
Emergency Exit Indicators

Fort Eustis policy governing radioactive wastes: For more information call: Post Safety Office - 878-3740

COMMON MEDICAL WASTES AT FORT EUSTIS AND FORT STORY

Anything contaminated with body fluids, such as blood
Sharps (Needles)
Medicines or drugs

Fort Eustis policy governing medical wastes:

For more information call: US Army MEDDAC Environmental Protection Assistant - 314-7688

Tab 2 Appendix R Solid Waste Disposal Guide* (Revised September 2002)

WASTE ITEM NAME	IT SHOULD GO TO THE	FOR MORE INFORMATION CALL
Aerosol Cans	SWRPPC - Building 1209 (FE) 0700-1530 hrs, M-F	878-4232
	SWRPPC, Building 1053, 0900-1600 hrs, M-F	878-3915
Appliances, Metal (All Freon or refrigerants must be recovered prior to recycling. Personnel	SWRPPC – Building 1209 (FE) 0700-1530 hrs, M-F	878-2692
must bring documentation of proper recovery by certified technician.)	SWRPPC, Building 1053, 0900-1600 hrs, M-F	422-7634
Batteries (Government-owned automotive wet-cell)	RDOL Reparable Item Exchange Activity (RIXA) – Building 1411 (FE)	878-4907
	Building 931 (FS) (Must coordinate in advance)	422-7818
Batteries Dry Cell (Nickel Cadmium, Lead Acid, Alkaline,	Hazardous Waste Accumulation Facility (FE) Hazardous Waste Accumulation Center Building	878-3915
Lithium) - Universal Waste	1011 (FS)	878-3915
D	GWIRDEG R 'III' 1000 (FF)	Appointment Needed
Batteries (Non-Government- owned automotive wet-cell)	SWRPPC- Building 1209 (FE) 0700-1530 hrs, M-F	878-2692
	SWRPPC, Building 1053 (FS) 0900-1600hrs(Must coordinate in advance), M-F	422-7634
Burnable, non-recyclable items under 3' x 3'	Appropriate Dumpster (FE & FS)	878-4232
Biomass (includes yard clippings, leaves, twigs, pet wastes)	SWRPPC- Building 1209 (FE) 0700-1530 hrs, M-F	878-4232
	SWRPPC Building 1053 (FS) 0900-1600hrs, M-F	422-7634
Compressed Gas Cylinders,	Recycling Center – Building 1209 (FE)	878-2692
Non-refillable (OSHA) Empty	Must be coordinated in advance – FS	878-2692
(Value removed, 2 nd hole drilled	*HazMart will accept empty cylinders if cylinder	878-2781 (FE)
in lower end of cylinder)	was issued by them.	462-4053 (FS)
Concrete/Cinderblocks (Metal must be removed)	SWRPPC- Building 1209 (FE) 0700-1530 hrs, M-F	878-4232
	SWRPPC, Building 1053 (FS) 0900-1600hrs, M-F	422-7634
Concertina Wire (Must be cut into 3" lengths and placed in a 5 GL bucket)	SWRPPC- Building 1209 (FE) 0700-1530 hrs, M-F	878-4232
OD oderet)	Must be coordinated in advance –(FS)	422-7634

Construction Debris	SWRPPC – Building 1209 (FE)	878-4232	
	0700-1530 hrs, M-F		
	SWRPPC, Building 1053 (FS)	422-7634	
	0900-1600hrs, M-F		
Dead Animals (Wild)	ENRD, DPW (FE)	878-2375	
	Provost Marshall (FS)	422-7141	
Drums, OSHA Empty Steel	SWRPPC - Building 1209 (FE)	878-4232	
	0700-1530 hrs, M-F		
	ŕ		
	Must be coordinated in advance - FS	878-4232	
Filters (Oil and fuel)	SWRPPC – Building 1209 (FE)	878-3915	
	0700-1530 hrs, M-F	2,2,2,2	
	Hazardous Waste Accumulation Facility –	878-3915	
	Building 1053 (FS) Appointment needed.	070 3713	
Eine Entinentiahens		979 4222	
Fire Extinguishers	SWRPPC – Building 1209 (FE)	878-4232	
(non-halon)	0700-1530 hrs, M-F		
	TT 1 TT 4 A 14' TO 11'	070 201 5	
	Hazardous Waste Accumulation Facility –	878-3915	
	Building 1011 (FS) Appointment needed.	272 (222	
Fluorescent Light Bulbs	SWRPPC – Building 1209 (FE)	878-4232	
(Universal Waste)	0700-1530 hrs, M-F		
	Hazardous Waste Accumulation Facility –	878-3915	
	Building 1011 (FS) Appointment needed.		
Fluorescent light fixture ballasts	SWRPPC – Building 1209 (FE)	878-3915	
_	0700-1530 hrs, M-F		
	Building 1011 (FS) Appointment needed.	878-3915	
Hazardous Waste (any)	Hazardous Waste Accumulation Facility -	878-3915	
	Building 1208 (FE)		
	Building 1011 (FS) Appointment needed.	878-3915	
Household Hazardous Waste	SWRPPC – Building 1209 (FE)	878-4232	
(Generated within the housing	0700-1530 hrs, M-F	070 1232	
area – No wastes from off-post	SWRPPC, Building 1053 (FS)		
will be accepted.)	0900-1600hrs, M-F	878-4232 (Special rules apply.	
will be accepted.)	0700 1000ms, W 1	SPSA accepts up to 5 GL of liquid	
	SPSA Ocean District Drop Site, 2025 Va. Beach	and 75 lbs of solid household	
	Blvd. Near Fort Story West Gate	hazardous waste per visit.)	
	1 st and 2 nd Saturday of Each Month, 0900-1200	nazardous waste per visit.)	
Large itams area 2' 2' 1	(FS)	878-4232	
Large items over 3' x 3', wood,	SWRPPC – Building 1209 (FE)	8/8-4232	
pallets, and furniture (NO	0700-1530 hrs, M-F		
METAL FE)	CHIPPIC D. T.T. 1072 (FC)	100 750 1	
	SWRPPC, Building 1053 (FS)	422-7634	
	0900-1600hrs, M-F	272 :: 22	
Large limbs and bushes (Over 3'	SWRPPC – Building 1209 (FE)	878-4232	
long X ½" diameter)	0700-1530 hrs, M-F		
	SWRPPC, Building 1053 (FS)	422-7634	
	0900-1600hrs, M-F		
Liquid (any)	Hazardous Waste Accumulation Facility -	878-3915	
	Building 1208 (FE)		
	Building 1011 (FS) Appointment needed at both	878-3915	
	locations.		

Mattresses	SWRPPC – Building 1209 (FE) 0700-1530 hrs, M-F	878-4232	
	Wood Dumpster at Recycling Center – Building 1053 (FS)	422-7634	
	0900-1600hrs, M-F		
Medical Waste (any)	MEDDAC Incinerator (Call before delivery of wastes)	878-4531	
Metal Items, Large (Wood or	SWRPPC – Building 1209 (FE)	878-4232	
other material must be removed)	0700-1530 hrs, M-F		
	SWRPPC, Building 1053 (FS) 0900-1600hrs, M-F	422-7634	
Used Oil	Contractor Pickup (FE)	878-3915	
	Contractor Pickup (FS)	422-7344	
Paint	Hazardous Waste Accumulation Facility -	878-3915	
	Building 1208 (FE)		
	Building 1011 (FS) Appointment needed	878-3915	
Petroleum, Oil and Lubricants	Hazardous Waste Accumulation Facility -	878-3915	
,	Building 1208 (FE)		
	Building 1011 (FS) Appointment needed.	878-3915	
Pallets (Serviceable, but no	SWRPPC – Building 1209 (FE)	878-2692	
longer needed)	0700-1530 hrs, M-F		
	SWRPPC, Building 1053 (FS)	422-7634	
	0900-1600hrs, M-F		
Pallets (one or more boards	SWRPPC – Building 1209 (FE)	878-4232	
broken)	0700-1530 hrs, M-F		
	SWRPPC, Building 1053 (FS)	422-7634	
	0900-1600hrs, M-F		
Recyclable Items	SWRPPC – Building 1209 (FE)	878-2692	
	0700-1530 hrs, M-F	878-4232	
	SWRPPC, Building 1053 (FS) 0900-1600hrs, M-F		
Solid Waste from Home	County or City of Origin – Not on Fort Eustis or	878-4232	
Solid Waste Holli Hollie	Fort Story	070 4232	
Tires	SWRPPC – Building 1209 (FE)	878-4232	
Thes	0700-1530 hrs, M-F	076 1232	
	FS – bring to FE		
	Make appointment for large volume.		
Utility Poles, Cut to 8' Length	SWRPPC – Building 1209 (FE)	878-4232	
	0700-1530 hrs, M-F		
	SWRPPC, Building 1053 (FS)		
	0900-1600hrs, M-F	422-7634	

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Tab 3 Appendix R Fort Eustis and Fort Story Collection Schedule

Fort Eustis. Recyclables are collected from family housing areas every Wednesday. Municipal solid waste is collected from the family housing areas according to the following schedule:

- Each Monday 300, 400, and 1100 blocks.
- Each Wednesday 1900, 2100, 2500, 2700, and 2900 blocks.
- Each Thursday 100 and 2300 blocks.

Deviations from this schedule due to holidays or inclement weather will be announced in advance via electronic mail, flyers, The Wheel, or other public media. Attachment Tab 3 also provides this schedule.

NOTE: A new Fort Eustis Solid Waste contract will be in effect in early CY 2003. The new contract may result in changes to the above schedule and types of items picked up by the contractor. ENRD will provide updates when the new contractor is selected.

Fort Story. Household trash is collected from family housing areas every Tuesday. Household recyclables are collected from family housing areas every other Tuesday. Contractors collect both household trash and recyclables.

Tab 4 Appendix R Fort Eustis Household Chemical Exchange Program

The Fort Eustis Household Chemical Exchange Program (HCEP) is limited to military personnel and their family members residing on Fort Eustis. The purpose of this program is to keep household chemicals from being discarded in the trash and to maximize their reuse. Household chemicals from off-post are prohibited. Most communities surrounding Fort Eustis and Fort Story have their own local programs.

The Environmental and Natural Resources Division (ENRD) of the Directorate of Public Works (DPW) operates the Household Chemical Exchange Program through its Solid Waste, Recycling, and Pollution Prevention Center (SWRPPC) located in Building 1209.

Turn-ins of Household Chemicals: The SWRPPC, will accept household chemicals that are identifiable and in the original container and labeled. Items will be accepted during the hours of 0900 - 1500, Monday through Friday at Building 1209. Personnel will have to verify their on post residency (ID, residence number) in order to drop off items. For more information, call 878-4232.

Issue of Household Chemicals: Household chemicals in their original containers and free from any leaks, rust, corrosion, or significant dents will be available for issue Monday through Friday from 1300 to 1500 hours. Personnel will have to verify their on post residency and sign a waiver of liability in order to pick up items. Serviceable items will be issued for reuse at no charge.

ACCEPTABLE ITEMS	rodenticides	
Household Maintenance Products	pool chemicals	
rust preventatives	Automotive Products	
wood strippers & preservatives	brake fluid	
paint thinners	transmission fluid	
degreasers	radiator cleaners	
creosote	engine and radiator flushes	
paint/paint products including aerosols	car waxes	
serviceable non vehicular batteries (i.e. clocks,	gasoline or its mixtures	
radios, flashlights, games, toys)	kerosene	
solvents and sealants	Miscellaneous Products	
Household Cleaning Products	photo chemicals	
drain cleaners	mothballs	
metal polishers	art and craft supplies	
dry-cleaning fluids	aerosols (non-paint) (i.e. room fresheners, cleaners,	
bleaches	disinfectants, spray starches)	
ammonia	old chemistry sets	
oven and floor cleaners and waxes	fire extinguishers (household use)	
dish washing and laundry detergents	propane gas cylinders (household use)	
glass cleaners	UNACCEPTABLE ITEMS	
furniture polishes	radioactive containing items (i.e. smoke detectors, etc)	
Lawn and Garden Products	explosives, gun powder, flares, ammunition	
fertilizers	medical items and substances regulated by the Drug	
	Enforcement Agency	
herbicides/pesticides	unknown materials	
insect sprays	asbestos, refrigerant from old appliances	

Appendix S

Affirmative Procurement

S-1. Purpose. This appendix establishes policies and procedures for the purchase of products with recycled and recovered materials, environmentally preferable products- which have less toxic effects on human health and the environment, and bio-based products.

S-2. References.

- a. Resource Conservation and Recovery Act § 6002 (42 USC § 6962) http://www4.law.cornell.edu/uscode/42/6962.html
- b. Federal Compliance with Right-To-Know Laws and Pollution Prevention, Executive Order 12856, 3 August 1993.

http://www.denix.osd.mil/denix/Public/Legislation/EO/note15.html

c. Greening the Government Through Waste Prevention, Recycling and Federal Acquisition, Executive Order 13101, 14 September 1998.

http://www.ofee.gov/eo13101/13101.htm

- d. Federal Acquisition Regulation (FAR) Subchapter D, Part 23.404 http://www.arnet.gov/far/loadmain.html
- e. Defense Federal Acquisition Regulation Supplement 223.4 http://www.acq.osd.mil/dp/dars/dfars/html/223 4.htm
- f. Comprehensive Procurement Guidelines (CPG) I, 60 FR 21370, 1 May 1995. http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1995/May/Day-01/pr-213.html
 - g. CPG II, 62 FR 60962, 13 November 1997.

http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1997/November/Day-13/f29734.htm

h. CPG III, 63 FR 165, 26, August 1998

http://www.ofee.gov/html/comprehe.pdf

- i. Recovered Materials Advisory Notice (RMAN), 60 FR 21386, 1 May 1995. http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1995/May/Day-01/pr-211.html
 - j. RMAN I, 61 FR 26986, 29 May 1996.

http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1996/May/Day-29/pr-571.txt.html

http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1998/June/Day-08/f15176.htm

- k. RMAN II, 62 FR 60995, 13 November 1997. http://www.epa.gov/epaoswer/non-hw/procure/rman2.htm

1. RMAN III, 63 FR 165, 26 August 1998. $\underline{http://www.epa.gov/docs/fedrgstr/EPA-WASTE/1998/August/Day-26/f22794.htm}$

m. Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act, 12 May 1999. http://www.ofee.gov/html/rcra2.htm

- n. The Affirmative Procurement Program; Office of the Secretary of Defense, Under Secretary of Defense (Acquisition and Technology), July 1995.
- http://aec.army.mil/prod/usaec/et/p2/memo 01.htm
- o. AR 200-1; Section 10.3 http://books.army.mil/cgi-bin/bookmgr/BOOKS/R200_1/CONTENTS

S-3. Background.

- a. Waste Minimization and Diversion. The Resource Conservation and Recovery Act (RCRA) of 1976 began the regulatory tide toward waste minimization and the conservation of natural resources. Section 6002 of RCRA, later codified as 42 U.S.C. 6962, set the stage for recycling the wastes that could not be avoided through source reduction. Recycling became an important tool that helped to avoid the cost and environmental impacts created by the disposal of wastes. It also provided an opportunity for the manufacture of new products utilizing materials recovered through recycling. Many businesses already utilized materials recovered from their manufacturing processes in order to avoid the extra disposal costs.
- b. Close the Loop. The use of recovered materials to manufacture other goods and the use of the least harmful products to our environment and human health support the original intent of RCRA in 1976, and the Pollution Prevention Act of 1990. The new national goal set for the federal government is 35% waste diversion by 2005. If we manufacture new goods with this 35%, we must "close the loop" by purchasing these goods.
- c. EPA Designated Products. RCRA Section 6002 requires the Environmental Protection Agency (EPA) to designate items that are or can be made with recovered materials and to provide minimum recycled-content standards for the procurement of these items. The intent is to create a larger demand for items with recovered material, thus stimulating the demand for recyclables and avoiding the disposal of these items. Since the original passage of RCRA, the EPA has designated more than 50 products within 8 product categories described in a series of three Comprehensive Procurement Guidelines (CPGs) published in the Federal Register. These categories include: (1) paper and paper products; (2) vehicular products; (3) construction products; (4) transportation products; (5) landscaping products; (6) non-paper office products; (7) park and recreation products; and (8) miscellaneous products. More specific descriptions of CPG items can be found in TAB 1. Each CPG is accompanied by a Recovered Materials Advisory Notice (RMAN), published not as a regulatory document, but as a complementary document containing a more detailed explanation of the products and the minimum recommended recovered material content for each designated product. TAB 2 contains definitions for the various terms used in this Appendix See Section 2, References and Section 15 for appropriate web sites about CPG, RMAN and vendor sources for recycled products.
- d. Agency Policies. The procurement of these designated products containing recovered materials was reinforced through the Federal Acquisition Regulation (FAR), several Executive Orders (EOs), Army Regulation (AR) 200-1, and several memoranda and briefings from the Department of Defense and the Department of the Army. Most federal agencies have published their own requirements that mirror the requirements set forth in RCRA, EO 13101, and previous EOs that required federal agencies to develop programs for the procurement of products containing recovered materials, also known as affirmative procurement.
- e. Compliance. The Congressional legislation and EPA guidance concerning affirmative procurement has centered on creating a national strategy for environmental protection rather than punishing non-compliance. However, in response to EO 13101 § 403, EPA has stated that compliance with affirmative procurement regulations will be evaluated as part of regular RCRA and multi-media inspections of federal facilities. Although EPA may not assess fines on federal facilities for non-compliance, Notices of Violation (NOVs) will be issued if the facility is out of compliance with Section 6002 of RCRA. The EPA has indicated that although the focus will be on vehicular products; re-refined oil, retread tires, and engine coolant, it may evaluate any item included in any of the Comprehensive Procurement Guidelines (CPGs).

f. Who Must Comply. The requirements of the program apply to any procuring agency spending \$10,000 or more in federally appropriated funds for items listed in the CPGs. This applies either when the purchase price of one item exceeds \$10,000 or the total cost of designated items exceeded \$10,000 in the previous fiscal year. The U.S. Code 42, § 6962, as well as the FAR, further state that an agency may make a decision not to procure such items when (a) the items are not available within a reasonable period of time; (b) the items fail to meet the performance standards set forth in the applicable specifications; (c) the items are only available at an unreasonable price; (d) are not available from a sufficient number of sources to maintain a satisfactory level of competition.

If the decision is made not to comply with affirmative procurement regulations, then the justification for that decision must be submitted in writing by the procuring activity. A copy of this decision will be retained in the DPC files. Written justification for non-compliance with affirmative procurement regulations does not apply to micropurchases (credit card purchases less than \$2,500.00).

g. Summary. The Federal Government is responsible for almost 20% of the gross domestic product (GDP). The buying power of the Department of Defense alone accounts for 2-3 percent of the GDP. This presents a tremendous opportunity for good environmental stewardship through waste disposal avoidance. It also stimulates the markets for recyclables and ensures that local recycling programs continue.

S-4. USATC Affirmative Procurement Policy.

a. General Policy. The USATC has been actively diverting a significant amount of its solid waste through the Recycling Center since 1990. The installation has an interest in sustaining markets for recyclables as it strives to increase the solid waste recycled and decrease the solid waste disposed of each year. With this in mind, it is in the best interest of the installation to purchase products made from recovered materials whenever possible. If consumers do not purchase these products, the demand for recyclables will drop.

Therefore, it is the policy of the USATC to "buy recycled" whenever it is possible to do so for a reasonable price, within a reasonable period of time for a product quality equal to or greater than is available for the same product containing virgin materials. Procurement personnel (including credit card holders) are encouraged to obtain items included in the CPG with the highest content of post-consumer materials available. Items may also be available that are not included in the CPG, but are manufactured with recovered materials. Procurement personnel should give these products the same consideration as those listed in the CPG as long as products met the criteria stated in Section 3.f. The installation wants to place emphasis on the use of "recycled content" products in construction and renovation. TAB 3 has a copy of the form which DPW contractors can use in documenting their use of recycled content products. It is recommended that this form can be adapted for use by other activities in their procurement of materials which may not have a construction purpose.

Affirmative procurement guidance also recommends that each procuring agency review contract specifications and revise them as necessary to permit the use of recovered materials. Many older contract specifications require the use of virgin materials, so a review of existing specifications should be conducted to remove any unnecessary barriers to affirmative procurement.

b. General Program Implementation. The EPA, the Commonwealth of Virginia Department of Environmental Quality, as well as Department of Defense and Department of the Army look to the Environmental and Natural Resources Division (ENRD), Directorate of Public Works (DPW) to implement and report on installation adherence to EOs, RCRA, and the Pollution Prevention Act of 1990. The ENRD, DPW shall take the lead with respect to the Affirmative Procurement Program. The ENRD, DPW shall work closely with the Northern Region Contracting Center-Installation Division and the Regional Directorate of Logistics (RDOL) to develop and communicate guidance for the purchase of those products with recovered materials, as well as to implement regulations concerning affirmative procurement, including FAR clauses 52.223-4 Recovered Material Certification; and 52.223-9 Estimate of Percentage of Recovered Material Content for EPA Designated Products.

Procurement personnel are encouraged to determine which CPG items they purchase. Information concerning CPG items will be available at the ENRD, DPW website http://dpw-web.eustis.army.mil/ENRD/ENRDhome/index.htm or by contacting ENRD, DPW at 878-4123.

ENRD, DPW will use a promotional strategy to keep installation personnel apprised of information related to Affirmative Procurement Program compliance. The promotional efforts are comprised of the following components:

- Electronic mail
- ENRD/DPW Website http://dpw-web.eustis.army.mil/ENRD/ENRDhome/index.htm
- Training events
- Fact Sheets

ENRD, DPW will conduct a survey of selected activities near the end of each fiscal year to gauge the progress of participation in the Affirmative Procurement Program.

S-5. Specific Guidelines for Implementation of Affirmative Procurement of Product Categories

The guidelines for implementation of the Affirmative Procurement Program are outlined for each product category in Sections 6- 16. Questions regarding these guidelines should be directed to ENRD, DPW at 878-4123. More detailed information can also be found at the ENRD, DPW website, located at http://dpw-web.eustis.army.mil/ENRD/ENRDhome/index.htm

S-6. Paper and paper products.

- a. Personnel who procure paper on behalf of individual Fort Eustis and Fort Story activities are encouraged to purchase paper with the maximum recovered material and post-consumer content practicable. The CPG RMANs describe more than 11 different categories of paper and paper products that contain post-consumer and recovered materials. The contents of these RMANs are summarized on various EPA web sites-(See Reference section and Section 15 of this Appendix) or consult ENRD, DPW website for more detailed information on the procurement of other kinds of paper with recovered materials content. http://dpw-web.eustis.army.mil/ENRD/ENRDhome/index.htm.
- b. Printing and writing papers comprise a large percentage of the paper purchased at Fort Eustis and Fort Story. Examples include stationery, computer printout paper, note pads, copier paper, and offset paper. These papers may be either coated or uncoated. Generally, personnel are encouraged to purchase uncoated writing paper used as copier, computer or notepaper that contains a minimum of 30% post-consumer content.

S-7. Vehicular Products. The Three Vehicular Products included in the CPG are Re-Refined Oil, Engine Coolant and Retread Tires.

- a. RE-REFINED OIL. Procurement personnel are encouraged to purchase re-refined oil instead of virgin oil when possible. The EPA recommends that the re-refined oil content be 25% or greater. This guideline applies to procurement personnel who purchase engine oil, hydraulic oil, or gear oil for ground vehicles. Most activities must use the Hazmart for the purchase of oil. The Fort Eustis Hazmart is located in building 1205 and can be reached at 878-2781. The Fort Story Hazmart is located in building 2717 at Little Creek Naval Amphibious Base and can be reached at 462-4025.
- b. ENGINE COOLANT. All who utilize tactical vehicles are encouraged to utilize recycled engine coolant (antifreeze). Most work-sites are equipped with an onsite coolant recycler. Activities with no onsite coolant recycler may utilize coolant recycled by other installation activities or contact ENRD, DPW at 878-4232, for assistance in having their coolant recycled. Although coolant can use propylene glycol as the chemical base, this is not currently authorized for use in tactical vehicles. If propylene glycol becomes authorized for tactical vehicles, procurement personnel should be careful not to purchase two different types of coolant for use in the same vehicle or coolant recycler.
- c. RETREAD TIRES. Individual activities determine their participation in the installation retread tire program. Activity procurement personnel should consult the ENRD, DPW website at http://dpw-web.eustis.army.mil/ENRD/ENRDhome/index.htmorcall 878-4123 for information on participating in the program.

S-8. Paint (Architectural Applications).

- a. Paint must be purchased through the Fort Eustis Hazmart, located in building 1205 or the Fort Story Hazmart, located at Little Creek Naval Amphibious Base. Procurement personnel are encouraged to give preference to latex paints for architectural applications and primary consideration to reprocessed latex paints. Refer to for the post consumer content requirements for latex paint listed on various RMAN EPA web sites-(See Reference section and Section 15 of this Appendix).
- b. When oil-based or anti-corrosive paints are selected, personnel are encouraged to select paints that do not exceed the following volatile organic compounds (VOCs) content:

```
Interior Coatings . . . . . 50 g/l (flat)
Interior Coatings . . . . . 150 g/l (nonflat)
Exterior Coating . . . . 100 g/l (flat)
Exterior Coating . . . . 200 g/l (nonflat)
Solvent-based Paints . . . 380 g/l
Water-based acrylic . . . 250 g/l
Catalyzed Epoxy . . . . 250 g/l
```

Source: Aberdeen Proving Ground Study on Environmentally Preferable Paints

c. Procurement personnel should always read the product material safety data sheet (MSDS) and are encouraged to avoid purchasing paints containing any the materials listed below:

Methylene Chloride	Di-n-butyl phthalate
1.1.1-Trichloroethane	Di-n-ocytl phthalate
Benzene	Diethyl phthalate
Toluene (methylbenzene)	Dimethyl phthalate
Ethylbenzene	Isophorone
Vinyl Chloride	Formaldehyde
Naphthalene	Methyl ethyl ketone
1,2-Dichlorobenzene	Methyl isobutyl
Di (2-ethylhexyl) phthalate	Acrolein
Butyl benzyl phthalate	Acrylonitrile
_	

Source: Aberdeen Proving Ground Study on Environmentally Preferable Paints

The affirmative procurement policy applies to all paint purchases, except for paints used to paint aircraft, watercraft, and ground vehicles. All paints will be purchased through the Fort Eustis or Fort Story Hazmart.

S-9. Non-Paper Office Products.

There are a total of 12 different types of office products made of plastic and steel that contains recovered materials and post consumer fibers. These include binders, clipboards, file folders, office recycling containers, waste receptacles, trash bags, desktop accessories, printer ribbons, and toner cartridges. Procurement personnel are encouraged to purchase plastic or steel non-paper office products containing post-consumer and recovered materials. Personnel may elect to purchase non-paper office products made of some material other than plastic or steel. Please refer to EPA web sites (see reference section) and Section 15 of this Appendix for a full list of these products and the guidelines for minimum recovered material and post-consumer content.

S-10. Construction Products.

- a. There are several different construction products currently available containing recovered and/or post-consumer materials. Some of these products include building insulation, carpet, cement and concrete containing coal fly ash, patio blocks, and laminated paperboard. Please refer to EPA web sites (see reference section) and Section 15 of this Appendix for a full list of these products and the guidelines for minimum recovered material and post-consumer content.
- b. Construction products are made from a variety of materials; some contain recovered materials and some do not. Personnel are encouraged to specify and purchase construction products containing recovered and/or post-consumer materials when the price, specifications, and availability are comparable to or exceed products containing virgin materials. If the product is made of virgin materials and is not available with recovered or post-consumer materials, there is no affirmative procurement guideline.

S-11. Landscaping Products.

- a. There are seven different landscaping products currently available containing recovered and/or post-consumer materials. Some of these products include garden hoses, soaker hoses, hydraulic mulch, lawn and garden edging, compost, and plastic lumber. Please refer to for a full list of these products and the guidelines for minimum recovered material and post-consumer content.
- b. Landscaping products are made from a variety of materials; some contain recovered materials and some do not. Personnel are encouraged to specify and purchase landscaping products containing recovered and/or post-consumer materials when the price, specifications, and availability are comparable to or exceed products containing virgin materials. If the product is made of virgin materials and is not available with recovered or post-consumer materials, there is no affirmative procurement guideline.

S-12. Transportation Products

- a. There are six different transportation products currently available containing recovered and/or post-consumer materials. Some of these products include channelizers, delineators, parking stops, traffic barricades, and traffic cones. Please refer to EPA web sites (see reference section) and Section 15 of this Appendix for a full list of these products and the guidelines for minimum recovered material and post-consumer content.
- b. Transportation products are made from a variety of materials; some contain recovered materials and some do not. Personnel are encouraged to specify and purchase transportation products containing recovered and/or post-consumer materials when the price, specifications, and availability are comparable to or exceed products containing virgin materials. If the product is made of virgin materials and is not available with recovered or post-consumer materials, there is no affirmative procurement guideline.

S-13. Parks and Recreation Products.

- a. There are five different parks and recreation products currently available with recovered and/or post-consumer materials. Some of these products include plastic fencing, playground surfaces, running tracks, picnic tables/benches and playground equipment. Please refer to EPA web sites (see reference section) and Section 15 of this Appendix for a full list of these products and the guidelines for minimum recovered material and post-consumer content.
- b. Parks and recreation products are made from a variety of materials; some contain recovered materials and some do not. Personnel are encouraged to specify and purchase parks and recreation products containing recovered and/or post-consumer materials when the price, specifications, and availability are comparable to or exceed products containing virgin materials. If the product is made of virgin materials and is not available with recovered or post-consumer materials, there is no affirmative procurement guideline.

S-14. Miscellaneous Products.

- a. There are seven different miscellaneous products outlined in the CPG that are currently available containing recovered and/or post-consumer materials. Some of these products include pallets, sorbents, industrial drums, awards/plaques, mats, strapping, and signs. Please refer to EPA web sites (see reference section) and Section 15 of this Appendix for a full list of these products and the guidelines for minimum recovered material and post-consumer content.
- b. The miscellaneous products outlined in the CPG are made from a variety of materials; some contain recovered materials and some do not. Personnel are encouraged to specify and purchase products containing recovered and/or post-consumer materials when the price, specifications, and availability are comparable to or exceed products containing virgin materials. If the product is made of virgin materials and is not available with recovered or post-consumer materials, there is no affirmative procurement guideline.

S-15. Sources for Products and Information on Affirmative Procurement.

There are many sources for products with recovered materials, as well as for environmentally preferable products. Many of the sources are within the Federal Supply System (FSS), but there are also many local businesses that carry products that fit within the affirmative procurement framework. Some of the sources listed here are sources of supply. Others are sources of information that provide more details about affirmative procurement to assist personnel with procurement decisions.

Partial List of Product Sources & Information

A. GENERAL DATA:

- 1. GreenSpec Binder, Environmental Building News, www.ebuild.com
- 2. Certified Forest Products Council, www.cerifiedwood.org/
- 3. Wiley Series in Sustainable Design, www.wiley.com/
- 4. The Carpet and Rug Institute, www.carpet-rug.com/
- 5. Information, McGraw-Hill, dialogue@mcgraw-hill.com
- 6. Florida Directory of Recycled Product Vendors,

www.2.dep.state.fl.us/waste/programs/rbac/downloads/rbac_dir.pd

- 7. Oikos Green Building Source, News, searchable products data base, library, www.oikos.com
- 8. Green Design Network, News, publications, databases, www.greendesign.net
- 9. Green Works Recycled Content7 Product Guide, detailed vendors directory,

www.metrokc.gov/greenworks/recvcontent.htm>

B. CONCRETE

- 1. GranCem, granulated blast-furnace slag, www.grancem.com/
- 2. Syndesis, cement-based, pre-cast product workable with wood tools, www.syndesisinc.com/

C. MASONRY

- 1. Heble Building Systems, autoclaved aerated concrete blocks, www.heble.com/
- 2 Ytong Florida Ltd., autoclaved aerated concrete blocks, www.ytong-usa.com/

D. WOOD & PLASTICS

- 1. Avonite, solid surfacing, www.avonite.com/
- 2. Chemical Specialties, wood treatment, www.treatedwood.com/
- 3. Homasote Company, structural fiberboard, www.homasote.com/
- 4. Isoboard, fiberboard composed of straw fibers and non-toxic resins, www.isoboard.com/
- 5. TrusJoist Mac Millan, engineered wood products, www.homasote.com/

E. THERMAL & MOISTURE PROTECTION

- 1. Duro-Last Roofing, recycled PVC walkway pads, 1-800-2480280
- 2. Johns Manville, Insulation products, www.jm.com/
- 3. Majestic Skylines, rubber-based slate-look roofing for steep roofs, www.majesticskylines.com/
- 4. Owens-Corning, insulation products, www.owenscorning.com/

F. DOORS & WINDOWS

- 1. Marvin Window & Door, windows, some meeting "Energy Star Label", www.marvin.com/
- 2. Pella, energy efficient windows, www.pella.com/

G. FINISHES

- 1. Armstrong World Industries, Inc.-Flooring Systems, www.armstrong-floors.com/
- 2. Armstrong World Industries, Inc.-Ceiling Systems, www.ceilings.com/
- 3. Benjamin Moore & Co., VOC free acrylic interior latex paint, www.benjaminmoore.com/
- 4. CanFibre Group Ltd., all-green medium-density fiberboard, www.canfibre.com
- 5. Chemrex Inc., low-e interior paint, www.chemrex.com/
- 6. Collins & Aikman Floor coverings, carpet with 100% post-consumer backing, www.powerbond.com/
- 7. DesignTex, Inc., polyester panel fabric made from 100% PET fiber, www.dtex.com/
- 8. Dodge-Regupol, Inc., 100% recycled rubber-flooring, www.regupol.com/
- 9. Eco-sensitive modular tile, vinyl tile with 100% recycled carpet-backing, www.powerbond.com/
- 10.Environmental Stone Products, stone manufactured from 100% recycled glass,

www.environmentalstone.com/

- 11. Glidden: residential interior latex paints 100% free of VOC, www.icipaintstores.com/
- 12. Homasote Inc., sound barrier, www.homasote.com/
- 13. Isoboard Enterprises, Inc. panel made from wheat straw and non-toxic resins, 1-503-2427345
- 14. Marley-Flexco Co., flooring made form 95% recycled truck and bus tires, www.marleyflexco.com/
- 15. The Mat Factory, Inc., interlocking roll-up tiles made from 100% postconsumer tire rubber and PVC plastic from electric cable covers, 1-949-6453122
 - 16. Permafirm Pad Co., carpet pads made from almost 100% recycled content, 1-800-3446977
 - 17. Sherwin Williams, VOC compliant paints and enamels, www.sherwin.com/
- 18. SierraPine Limited, formaldehyde-free particleboard and medium density fiberboard containing recycled/recovered wood fiber, www.sierrapine.com/
 - 19. Summittville Tiles, impervious porcelain tiles using feldspar tailings, www.summitville.com/
 - 20. Tectum, natural-fiber acoustical ceiling and wall panels, www.tectum.com/
 - 21. Tiles with natural fibers, tiles made of a bio-alloy material and natural fibers, www.maderatile.com
 - 22. USG Interiors, Inc., synthetic gypsum board, www.usg.com/
- 23. Decorative Architectural Tiles, floor, counter & wall tile made from $100\ \%$ postconsumer glass, 1-808-8857812
 - 24. Forbo, linoleum flooring utilizing renewable resources, <u>www.forbo.com/</u>

H. SPECIALTIES

- 1. The Access Store, modular ramping system made from 100% recycled rubber, www.accessstoe.com/
- 2. BP Solar, photovoltaic modules and systems, www.bp.com/bpsolar/index
- 3. Mecho Shade Systems, interior shadecloths, www.mechoshade.com/
- 4. R Control, structural insulated panel (SIP), www.mechoshade.com/

I. FURNISHINGS

- 1. Guilford of Maine, fabric from 100% recycled materials, www.terratex.com/
- 2. Phenix Biocomposites, tabletops made from soy based products free of petrochemicals, 1-800-3248187
- 3. Safe Solutions, LLC, furniture manufactured from waste wood, 1-970-2473333

J. CONVEYING SYSTEMS

1. Montgomery KONE, AC girlies elevators, www.montgomery-kone.com/

K. ELECTRICAL

- 1. Advance Transformer Company, linear reactor ballast, www.advancetransformer.com/
- 2. Artemide Inc., energy efficient cold-cathode lighting, www.artemide.com/
- 3. Edison Price Lighting, track mounted metal-halide PAR 30 &38 lamps, 1-212-5216995
- 4. Leviton Manufacturing Corporation, Inc., occupancy sensors, <u>www.leviton.com/</u>
- 5. Phillips Lighting, energy efficient compact fluorescent lamps, www.phillips.com/lighting
- 6 Osram Sylvania, mercury-free lamps and energy efficient fluorescent lamps, www.osramsylvania.com/
- 7. Sensor Switch, lighting control occupancy sensors, www.sensorswitch.com/
- 8. Venture Lighting, pulse-start high performance lamp and ballast system, www.venturelighting.com/

Other Sources:

1. Defense Supply Center Richmond:

Features the Environmental Products Catalog; access at www.dscr.dla.mil clicking on Catalogs with Online Ordering, then click on Environmental or call 1-800-352-2852.

2. Defense Logistics Agency: Features

Electronic Mall Shopping. Call 800-352-2852. www.supply.dla.mil Click on *Table of Contents*, scroll down to *DLA Environmental Support Products*, then click on *DSCR Environmentally Preferred Products Catalog*.

3. Office of the Federal Environmental

Executive: www.ofee.gov

4. Comprehensive Procurement Guidelines.

www.epa.gov/cpg

5. Environmentally Preferable Purchasing (EPP). www.epa.gov/opptintr/epp

S-16. Standards for Designated Products.

- a. Generally, the USATC policy is to purchase products with the highest content of post consumer materials that is available and practical. The standards have been published in detail in a total of four Recovered Material Advisory Notices (RMANs). These RMANs are referenced in Section 2, References of this appendix.
- b. It should be noted that there are usually two standards listed. There is a guideline for an overall percentage of recovered material content. However, in most instances there is also a guideline for post consumer content. The regulations go into great detail about the difference between recovered materials and post consumer materials. The goal is to encourage the use of as many <u>post-consumer</u> materials as possible, since post-consumer materials are what come from recycling centers around the nation. Recognizing that materials recovered from the manufacturing process are also important to solid waste diversion, the EPA has included the minimum percentage of post-consumer material as a portion of the total recovered materials. Thus, the main reason for communicating the standards and encouraging compliance to the standards is to ensure that the demand remains strong for post-consumer materials as well as all other recovered materials.
- c. It should also be noted that some of the products on the CPG are manufactured utilizing a broad range of materials. For example, landscaping timbers may be available in plastic or wood. The affirmative procurement guidelines set forth in the previously noted regulations and EOs do not require that the plastic landscaping timbers be selected instead of the wood timbers. It only requires that, if plastic timbers are selected, preference be given to plastic timbers containing the minimum recovered content standards described in the RMAN. The engineer, architect or technical POC still makes the decision concerning which product is better suited for the application.

S-17. Environmentally Preferable and Bio-Based Products.

- a. Environmentally preferable purchasing, or EPP, is the name of the US Environmental Protection Agency (EPA)'s program to encourage the purchase of products which have lesser or decreased effects on human health and the environment, when compared with competing products or services that serve the same purpose.
- b. EPP is implemented by requiring activities obtaining hazardous materials to provide DPW-ENRD with the MSDS for the proposed product before purchase. In that way, ENRD can ensure that the products do not contain components harmful to human health and/or the environment.
- c. A bio-based product is "a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials." Examples of bio-based products include vegetable-based lubricating oils, building construction panels made with straw or other agricultural fibers, and "tree-free" paper. This initiative is new and DPW-ENRD is awaiting guidelines from Department of Army to implement purchase of this product line.

S-18. Awards Program

The USATC recognizes the environmental stewardship of military and civilian personnel each April during Earth Week. As part of the existing awards effort, a program that recognizes exemplary efforts in affirmative procurement and the purchase of environmentally preferable products will be developed and implemented.

Tab 1 Appendix S

TAB 1: CATEGORIES AND DESIGNATED ITEMS COVERED BY THE COMPREHENSIVE PROCUREMENT GUIDELINES

Paper and Paper Products

- Printing and Writing Papers (Uncoated)
- Printing and Writing Paper (Coated)
- Bristol File Folders (Manila and Colored)
- Dyed Filing Products
- Cards, index, postal, other
- Pressboard Report Covers and Binders
- Tags and Tickets
- Newsprint
- Commercial/Industrial Sanitary Tissue Products
- Paperboard and Packaging Products
- Miscellaneous Paper Products

Vehicle Products

- Engine Coolants
- Re-refined Lubricating Oils
- Retread Tires

Construction Products

- Building and Insulation Products
- Carpet
- Cement and Concrete Containing Coal Fly Ash and Ground Granulated Blast Furnace Slag
- Consolidated and Reprocessed Latex Paint
- Floor Tiles
- Patio Blocks
- Shower and Restroom Dividers and Partitions
- Structural Fiberboard
- Laminated Paperboard
- Nylon Carpet (Broadloom and Tiles) Made with backing Containing Recovered Materials
- Carpet Cushion (Polyester)
- Flowable Fill Containing Coal Fly Ash and/or Ferrous Foundry Sands
- Railroad Grade Crossing Surfaces Containing Coal Fly Ash, Recovered Rubbers, or Recovered steel

Transportation Products

- Channelizers
- Delineators
- Flexible Delineators
- Parking Stops
- Traffic Barricades
- Traffic Cones

Landscaping Products

- Garden and Soaker Hoses
- Hydraulic Mulch
- Lawn and Garden Edging
- Yard Trimmings Compost
- Compost made from Yard Trimmings and/or Food Waste
- Plastic Lumber Landscaping Timbers and Posts Containing Recovered Materials

Non-Paper Office Products

- Solid Plastic Binders, Plastic Clipboards, Plastic File Folders, Plastic Clip Portfolios, and Plastic Presentation Folders Containing Recovered Plastic
- Binders
- Office Recycling Containers
- Office Waste Receptacles
- Plastic Desktop Accessories
- Plastic Envelopes
- Plastic Trash Bags
- Printers Ribbons
- Toner Cartridges

Park and Recreation Products

- Plastic fencing
- Playground Surfaces
- Running Tracks
- Park Benches
- Picnic Tables
- Playground Equipment

Miscellaneous

- Pallets
- Sorbents Containing Recovered Materials for Use in Oil and Solvent Clean-ups and as Animal Bedding
- Industrial Drums Containing Recovered Steel, Plastic, and Paper
- Awards and Plaques Containing Recovered Glass, Wood, Paper, or Plastic
- Mats Containing Recovered Rubber and/or Plastic
- Manual-Grade Strapping Containing Recovered Steel and Plastic
- Signs Containing Recovered Plastic or Aluminum and Sign Posts/Supports Containing Recovered Plastic or Steel

Tab 2 Appendix S Definitions

- 1. **AFFIRMATIVE PROCUREMENT.** The purchase of environmentally preferable products manufactured from recycled and reclaimed materials.
- 2. ACQUISITION. The acquiring by contract with appropriated funds for supplies or services (including construction) by and for the use of the Federal Government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated. Acquisition begins at the point when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation and selection of sources, award of contracts, contract financing, contract performance, contract administration, and those technical and management functions directly related to the process of fulfilling agency needs by contract.
- **3. ARCHITECTURAL PAINT.** Any latex or oil-based paint that is used for interior or exterior architectural applications such as wallboard, ceilings, and trim; gutter boards, concrete, stucco, masonry, wood, metal surfaces, and consolidated latex paints used for covering graffiti, where color and consistency of performance are not primary concerns.
- **4. BIO-BASED PRODUCT.** A bio-based product is "a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials." Examples of bio-based products include vegetable-based lubricating oils, building construction panels made with straw or other agricultural fibers, and "tree-free" paper. These products often put materials to use that were destined for the landfill. Since they are usually made of "natural" materials with limited processing, they may also be less toxic and require fewer chemicals and less energy to produce.
- **5. COMPREHENSIVE PROCUREMENT GUIDELINES (CPG).** Issued by the EPA pursuant to Section 6002 of the RCRA. These guidelines identify items that are or can be produced with recovered materials and provide recommended practice for procurement of such items. Three CPGs have been published in the Federal Register. Accompanying the CPGs are RMANs, which contain detailed minimum-content standards for products made with recovered materials.
- **6. CONTRACTOR (S).** The prime contractor, subcontractors, material suppliers, and equipment suppliers who provide the products that will be used in the construction of this project.
- **7. ENVIRONMENTALLY PREFERABLE.** Products or services having a lesser or reduced effect on human health and the environment when compared to competing products or services, serving the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packing, distribution, reuse, operation, maintenance, or product or service disposal. (EO 13101)
- **8. EPA DESIGNATED ITEM.** An item that is or can be made with recovered material; that is listed by the Environmental Protection Agency (EPA) in a procurement guideline (40CFR, part 427); and for which EPA has advised purchasing recommendations in a related Recovered materials Advisory Notice (RMAN). (FAR 23.402)
- **9. EXECUTIVE AGENCY OR AGENCY.** An executive agency as defined in 5 U.S.C. 105. For the purpose of this order, military departments, as defined in 5 U.S.C. 102 are covered under the auspices of the Department of Defense.
- 10. FORM. The Affirmative Procurement Reporting Form found at the end of this section.
- **11.POLLUTION PREVENTION.** Source reduction as defined in the Pollution Prevention Act of 1990 (42 U.S.C. 13102), and other practices that reduce or eliminate the creation of pollutants through (a) increased efficiency in the use of raw materials, energy, water, or other resources; or (b) protection of natural resources by conservation.

- 12. PRODUCT. Materials and equipment that will be used in the construction of this project.
- **13. POSTCONSUMER MATERIAL.** A material or finished product that has served its intended use and has been discarded for disposal or recovery, having completed its life as a consumer item. "Postconsumer material" is a part of the broader category of "recovered material".
- **14. PROCUREMENT PERSONNEL.** Personnel who write specifications to obtain services, supplies and construction" means anyone who purchases material with federally appropriated funds. This includes credit card holders.
- **15. PROCURING AGENCY.** Any State or Federal agency that uses federally appropriated funds for such procurement, or any person contracting with any agency for work to be performed under such contract.
- **16.RECOVERED MATERIALS.** Waste materials and by-products which have been recovered or diverted from solid waste, but such term does not include those materials and by-products generated from, and commonly reused within, an original manufacturing process. (EO 13101, 42 U.S.C. 6903 (19) and FAR 23.402)
- **17.RECYCLABILITY.** The ability of a product or material to be recovered from or otherwise diverted from the solid waste stream for the purpose of recycling. (EO 13101)
- **18.RECYCLING.** The series of activities, including collection, separation, and processing by which products or other materials are recovered from the solid waste steam for use in form of raw materials in the manufacture of new products other than fuel for producing heat or power by comb ustion. (EO 13101)
- **19.RECYCLED MATERIAL.** A material utilized in place of raw or virgin material in product manufacturing consisting of materials derived from postconsumer waste, industrial scrap, materila derivived from agricultureal wastes, and other items, all of which can be used in new product manufacturer. (EPA Guidelines & OFPP Policy Letter 92-4)
- **20.RECYCLED PRODUCT.** A recycled product is one made completely or partially from waste materials or byproducts recovered or diverted from the solid waste stream.
- **21.SOLID WASTE.** Garbage, refuse, sludges and other discarded materials including those from industrial, commercial, and agricultural operations, and from community activities. This excludes solids or dissolved materials in domestic sewage or other significant pollutants in water resources, such as silt, dissolved or suspended solids in industrial waste water effluents, dissolved materials in irrigation return flow, etc. (EPA Guidelines)
- **22. SPECIFICATION (S).** A clear and accurate description of the technical requirements for materials, products, or services including the minimum requirement for materials' quality and construction and any equipment necessary for an acceptable product. In general, specifications are in the form of written descriptions, drawings, prints, commercial designations, industry standards, and other descriptive references.
- **23.** UNREASONABLE PRICE. If the cost of the recycled content product exceeds the cost of a non-recycled item, the Air Force considers the cost to be unreasonable. (Air Force Affirmative Procurement Plan)
- **24. VERIFICATION.** Procedures used by procuring agencies to confirm both vendor estimates and certifications of the percentages of recovered materials contained in the products supplied to them or to be used in the performance of a contract. (EPA Guidelines)
- **25. WASTE PREVENTION.** Any change in the design, manufacturing, purchase, or use of materials or products (including packaging) to reduce their amount or toxicity before they are discarded. Waste prevention also refers to the reuse of products or materials.
- **26.WASTE REDUCTION.** Preventing or decreasing the amount of waste being generated through waste prevention, recycling, or purchasing recycled and environmentally preferable products.

Tab 3 Appendix S Affirmative Procurement Reporting Form (Per Executive Orders 13101/13148)

PROJECT NUMBER:
BLDG NUMBER:
PROJECT MANAGER
PROJECT INSPECTOR:
CONTRACTOR

This form is to be completed by the Contractor and submitted through Contracting Officer to DPW-Engineering and Services. It is the responsibility of the Engineering and Services construction inspector to submit this data to DPW-ENRD who in-turn reports it to Army Environmental Center IAW E.O. 13101, Federal Acquisition, Recycling, and Waste Prevention and E.O. 13148, Greening the Government through Leadership in Environmental Management

RECYCLED OR RECOVERED	% REQUIRED	%	QUANTIT	EXEMPTED
PRODUCT	(MINIMUM)	AVAILABLE	Y	1,2,3,4
		(ACTUAL)	USED	
-ROCK WOOL INSUL	75%			
-FIBERGLASS INSUL	20-25%			
-LOOSE FILL/SPRAY ON INSUL	75%			
-PERLITE COMP BOARD INSUL	23%			
-PLASTIC RIGID FOAM INSUL	9%			
-GLASS FIBER REINF FOAM INSUL	6%			
-PHENOLIC RIGID FOAM INSUL	5%			
-STRUCTURAL FIBER BD	80-100%			
-LAMINATED PAPER BD	100%			
-CEMENT/CONCRETE (FLYASH)	SEE SPEC			
-CARPET (PET)	25-100%			
-PATIO BLOCKS/RUBBER	90-100%			
-PATIO BLOCKS/PLASTIC	90-100%			
-FLOOR TILES/RUBBER	90-100%			
-FLOOR TILES/PLASTIC	90-100%			
-TRAFFIC CONES	50-100%			
-TRAFFIC BARRICADES	80-100%			
-PLAYGROUND SURFACES	90-100%			
-RUNNING TRACKS	90-100%			
-COMPOST	100%			
-WOOD-BASED HYDRAULIC MULCH	100%			
-PAPER-BASED HYDRAULIC MULCH	100%			
REPROCESSED LATEX PAINT WHITE, OFF-	20%			
WHITE & PASTEL COLORS				
REPROCESSED LATEX PAINT GREY, BROWN,	50-99%			
EARTHTONES & OTHER DARK COLORS				
CONSOLIDATED LATEX PAINT	100%			
PLASTIC/RUBBER PARKING STOPS	100%			
CONCRETE CONTAINING COAL FLY ASH	20-40%			
PARKING STOPS	20 10/0			
CONCRETE CONTAINING GGBF	25-70%			
PARKING STOPS				
PLASTIC SHOWER & RESTROOM	20-100%			
DIVIDERS/PARTITIONS				

CERTIFICATION

I hereby certify the Statement of Work/Specifications for the requisition/procurement of all materials listed on this
form comply with EPA standards for recycled/recovered materials content.

Contractor DPW-E&S Inspector

The following exemptions may apply to the non-procurement of recycled/recovered content materials:

- 1) The product does not meet appropriate performance standards
- 2) The product is not available within a reasonable time frame
- 3) The product is not available competitively (from two or more sources)
- 4) The product is only available at an unreasonable price (compared with a comparable non-recycled content product.)

Appendix T

Hazardous Substances Spill Prevention and Response

T-1. Purpose.

- a. Establishes policies and designates installation responsibilities for the prevention, control and response requirements associated with discharges of petroleum products, non-petroleum oils, and other hazardous substances.
- b. Emphasizes the provisions of the US Army Transportation Center Integrated Contingency Plan (ICP). The ICP applies to Fort Eustis and Fort Story. All tenant activities missions and tasks must adhere to the provisions of the ICP.

T-2. Key Applicable Regulations.

- a. The Clean Water Act (CWA) requires the preparation of a spill contingency plan and a spill prevention, control and countermeasure plan for discharges of petroleum and non-petroleum oil into water bodies. Federal regulations include Title 40 of the Code of Federal Regulations Part 112.
- b. Under Subtitle C of the Resource Conservation and Recovery Act (RCRA-C), owners/operators of facilities where hazardous waste is treated, stored or disposed of must have a contingency plan for response to any unplanned release of the wastes.
- c. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requires federal agencies to plan for emergencies and develop procedures for addressing petroleum product discharges and releases of hazardous substances, pollutants or contaminants. CERCLA provides a list of hazardous substances and their release quantity subject to reporting. Federal regulations include Title 40 of the Code of Federal Regulations Part 300.
- d. Section 112(r) of the Clean Air Act Amendments (CAAA) of 1990 include accidental release prevention provisions that apply to a special list of toxic substance and flammable substances when these items are present in the threshold quantity for the item. Additionally, compliance with the General Duty Clause of the CAAA is required for any hazardous substance. Federal regulations include Title 40 of the Code of Federal Regulations Part.
- e. The Emergency Planning and Community Right-to-Know Act (EPCRA) requires that each Local Emergency Planning Committee (LEPC) prepare an emergency response plan for the release of extremely hazardous substances (EHS) covered under the Act. EPCRA also requires facilities where EHS are present in the specified threshold quantity to notify the LEPC of the quantity used/stored, and to notify the LEPC of any reportable releases of an EHS. Federal regulations include Title 40 of the Code of Federal Regulations Part 355.
- f. Virginia regulations require the preparation and implementation of an Oil Spill Contingency Plan (OSCP) as well as telephonic and follow-up written notification of oil discharges.

T-3. Policy.

- a. Comply with the provisions of the ICP.
- b. Handle, use, and store all hazardous substances in a manner that prevents or minimizes the risk of discharge of petroleum products, non-petroleum oils and other hazardous substances into/on land, air, water, hardstands, roads, parking lots, and in the interior of buildings.
- c. Ensure storage facilities for petroleum products, non-petroleum oil and hazardous substances, and accumulation areas for non-hazardous wastes and hazardous wastes utilize preventive, control and countermeasures

such as dikes, catch basins, other secondary containment, vehicle drip pans, and drain protection to confine/contain the accidental spill or discharge of the such substances and to prevent or minimize the contamination of land, air and water resources.

- d. Prepare and maintain an installation contingency plan and site-specific contingency plans (that conform to the installation contingency plan) that ensure the resources and capabilities exist to appropriately respond discharge incidents at Fort Eustis and Fort Story.
- e. A discharge is defined as the accidental or intentional spilling, leaking, pumping, pouring, emitting, emptying, or dumping of any quantity of any hazardous material, hazardous substance, hazardous waste, non-hazardous waste, petroleum product or non-petroleum oil into or on any drains, land/soil, shop floor, hardstands, parking lot, road surface, motorpool or waters (including surface water, groundwater, storm drain lines, and drainage ditches). The term "discharge" is used interchangeably with the terms "spill" and "release".

T-4. Responsibilities.

- a. The Director of Public Works (DPW) will:
- (1) Be responsible for the installation spill prevention and emergency response program for Fort Eustis and Fort Story, and execute the program through the Environmental and Natural Resources Division (ENRD).
 - (2) Designate the Fire Chief of Fire & Emergency Services Division (DPW) as the Incident Commander (IC).
 - b. The ENRD will:
- (1) Develop and implement the US Army Transportation Center Integrated Contingency Plan (ICP) for Fort Eustis and Fort Story to comply with all applicable federal and state regulations, and AR 200-1.
- (2) Review and amend the ICP at least every three years or when changes in infrastructure or missions increase the risk of discharges.
- (3) Provide spill prevention training for Activity Environmental Coordinators and Hazardous Waste Coordinators during hazardous waste management training.
- (4) Provide and document spill prevention training for activities utilizing bulk petroleum storage facilities (including activities operating military watercraft and fuel transport vehicles) at least annually. This includes the 7th Transportation Group, ECS 93, DPW and DPTMSEC (Felker Army Airfield fuel farm). Additional tenant activities/operations may be added when mission changes, reorganizations, or infrastructure changes occur (or assignment of new organizations to Fort Eustis or Fort Story) that may potentially increase the risk of discharges. ENRD performs a risk assessment and determines when potential risks exist.
- (5) Provide spill prevention and notification procedures briefing to non-tenant activities utilizing or storing petroleum products, non-petroleum oils and other hazardous substances while operating or training at Fort Eustis and Fort Story. This primarily includes military units such as US Army Reserve and National Guard units, and other military organizations/units.
 - (6) Provide additional spill prevention training when requested.
 - (7) Coordinate oil spill response exercises. At least one exercise is conducted per year per installation.
 - (8) Assist Fire & Emergency Services in coordinating petroleum/hazardous substance response training.
 - (9) Document spill prevention and response training.
 - (10) Maintain a spill history file.

- (11) Coordinate spill prevention meetings for those activities managing or utilizing bulk petroleum (or other hazardous materials) storage containers (such as aboveground storage tanks, tank & pump units, HEMTs, tanker trucks, fuel barges).
- c. Directors, Commanders and supervisors of activities that generate hazardous waste or non-hazardous waste, or store/handle petroleum products, non-petroleum oils and other hazardous substances, and/or maintain military vessels or vehicles (to include tank & pump units, HEMTs or tanker trucks) will:
- (1) Prepare a written activity/site-specific discharge contingency plan for waste satellite accumulation sites (SAS), waste temporary storage sites (TSS), and petroleum, non-petroleum oils and hazardous substance storage/use areas in accordance with the USATC ICP. Plans must conform to the ICP and be available on site.
- (2) Ensure that personnel know the procedures for reporting discharges of petroleum products, non-petroleum oil and other hazardous substances. All discharges of any quantity into/onto any media must be reported to Fire & Emergency Services immediately.
- (3) Take all appropriate measures to prevent discharges from occurring and implementing control and countermeasures to mitigate the effects of spill incidents. Directors, Commanders and supervisors shall evaluate their operations, activities and locations on a case by case basis and implement the appropriate means of prevention and countermeasures. Such evaluations shall include the use of drain protection, diking, secondary containment, and proper transfer/handling techniques at a minimum. Assistance from ENRD shall be made if needed.
- (4) Utilize serviceable drip pans for all military vehicles. Drip pans will be monitored routinely to remove petroleum products (and other automotive fluids) so as to avoid discharge resulting from rain events.
- (5) Procure and utilize secondary containment systems for all vehicles used to transport or store bulk petroleum products (including but not necessarily limited to tank & pump units, HEMTs, and tanker trucks). Secondary containment systems must be durable, and capable of holding the capacity of the vehicle's cargo tanks plus 10%. Secondary containment systems will be inspected at a minimum weekly. Such inspections will be documented and maintained on file for at one year. Damaged systems will be fixed or replaced immediately.
- (6) Will maintain a supply of spill response equipment and supplies (such as spill kits) as appropriate. Spill material supplies should be available to handle, at a minimum, a spill from the largest container in storage or use. Spill kit materials must be compatible with the hazardous materials that have potential for discharge.
- (7) Shall comply with ENRD recommendations for spill prevention if it is determined that existing prevention means is inadequate or is nonexistent.
- (8) Will coordinate with ENRD for hazardous materials spill prevention training identified in paragraph 4.b.(4) above.
 - (9) Participate in spill prevention meetings as scheduled by ENRD.
 - d. All staff directorates, activities and subordinate commands will:
- (1) Implement the ICP and execute responsibilities contained therein when directed, to include providing assistance and resources when requested by the Incident Commander (IC).
 - (2) Be familiar with the ICP.
- (3) Provide information on facilities for listing in the inventory of potential spill sites in the ICP. New organizations assigned to either Fort Eustis or Fort Story or existing tenant activities that have mission changes or reorganization that involve new storage/use requirements or modification of existing storage/use of petroleum products, non-petroleum oils or other hazardous substances will notify ENRD immediately. If an organization/tenant

activity that no longer utilizes a storage/use petroleum or hazardous substance facility (such as a tank, vessel, barge, or a particular operation) will notify ENRD within 30 days of discontinuing operation or use of such facilities.

- e. Harbormaster, 3rd Port will:
- (1) Ensure that an adequate quantity of harbor boom exists to cordon off vessels involved in external fuel transfer and bilge pumping. Request funding and obtain boom to replace old, damaged or otherwise unserviceable boom.
 - (2) Ensure that the harbor boom is properly maintained.
- (3) Ensure that boom is deployed around vessels (involved in external transfer, bilge pumping or other activity for which a possible discharge may occur) prior to commencement of activity from which s discharge may occur.

T-5. ICP Provisions.

- a. General.
- (1) Federal, state and US Army regulations require several preventive and contingency plans concerning petroleum products, hazardous waste and other hazardous substances. These requirements have been combined into one plan, the USATC ICP.
- (2) The purpose of the ICP is to identify and assess potentially significant petroleum, non-petroleum oil, non-hazardous waste, hazardous waste, and hazardous substance discharge sites at Fort Eustis and Fort Story, identify and document means of preventing and controlling discharges, and describing the notification and response actions required in the event of a discharge.
- (3) The USATC ICP is in an electronic format. It does not exist a hardcopy document. It can be accessed from the Fort Eustis web site.
- (4) The ICP will be formally staffed for review and amendment at least every three years. Additionally, a review will be conducted when:
- (a) A major change in tenant activity mission, facility design, construction, operation, waste accumulation, or maintenance affecting the potential risk for spills of petroleum products, non-petroleum oil, waste or other hazardous substances occurs:
 - (b) A need for revision is identified during a spill response exercise;
 - (c) The plan fails or has serious shortfalls in an emergency;
 - (d) The Incident Commander (Fire Chief) changes; or
 - (e) The EPA Regional Administrator directs an amendment.
 - (5) The ICP will be certified by a registered professional engineer.
- (6) The contingency/response aspects of the ICP will be evaluated annually via an spill response exercise. At least one exercise will be conducted annually at each installation.
 - b. Activity Hazardous Material and Waste Contingency Plans (HMWCP).

- (1) All activities managing, accumulating, storing or using hazardous substances, hazardous waste or non-hazardous wastes (all SASs and TSSs), petroleum products or non-petroleum oils must have a contingency plan. Plans shall be specific to the activity, its operation(s) and location while conforming to the US Army Transportation Center Integrated Contingency Plan (ICP).
- (2) The activity's contingency plan must be reviewed annually and updated as required. Updates should be disseminated within two weeks of change. New employees should be briefed on emergency procedures within two weeks of employment. The plan shall provide for the following:
 - (a) Actions to be taken by activity personnel in response to emergency situations.
 - (b) Procedures for immediate notification of Fire & Emergency Services.
- (c) The plan should list names, office telephone numbers of activity personnel. The following notification order is recommended:
 - A. HWC.
 - B. Individual appointing HWC.
 - C. AEC.
 - (3) The plan should list all required emergency equipment to include the following:
 - (a) Fire extinguisher(s).
 - (b) Spill kit(s) compatible for the type of hazardous substance, waste, or petroleum product.
 - (c) Shovels, rakes, hoes, etc.
- (4) The plan should include a site-specific evacuation plan for activity personnel. Personnel should be evacuated to a safe area. Appropriate supervisors should account for all site personnel.
 - (5) The plan should cover the following emergency procedures:
- (a) Whenever there is an imminent or actual emergency, the person discovering the emergency will notify the HWC, AEC, or supervisor in charge; or will activate internal alarms or signaling devices; order an evacuation as required; and call **911 or 878-1008** (Fort Eustis FES) or **911 or 422-7141** (Fort Story Military Police).
 - (b) The AEC will collect and report the following information to ENRD within calendar 3 days:
 - Activity address and telephone number.
 - Date, time, and type of incident.
 - Names and quantities of materials involved.
 - Extent of injuries, if any.
 - An assessment of actual or potential hazards to human health and the environment.
 - Estimated quantities and disposition of recovered material that resulted from incident.

- (6) The plan shall include a description of measures taken to prevent spills and control potential incidents. Such descriptions shall include best management practices that include use of secondary containment or dikes, protection of drains, prevention of stormwater runoff, good housekeeping, routine inspection and monitor for leaks (of tanks, piping, hoses, secondary containment systems, and containers related to watercraft, vehicles and containers), deployment of boom during external fuel transfer, management of containers, proper operation of bilge pumping by trained personnel with appropriate supervision. etc.
- (7) Owners and operators of bulk fuel container systems (ASTs, tank & pump units, HEMTTs, fuel tanker trucks) shall include an inspection plan of the container(s) and the secondary containment system. Inspections must be performed at least weekly and documented.
- (8) Copies of the site-specific contingency plans will be kept on-site where materials are stored or wastes are accumulated for the activity's personnel use.
- (9) A site-specific HMWCP will be required at each storage site which stores 25 gallons or more of hazardous substances or petroleum products; more than 2 flammable compressed gas cylinders; any quantity of poisonous gases, dangerous when wet, or organic peroxides; and all TSSs and SASs.
- (10) A general contingency plan may be used when storing hazardous substances not requiring a site-specific plan in paragraph (8) above.
- (11) Copies of the site-specific contingency plan annex will be kept up to date for TSSs and must be distributed to the following organizations:
 - (a) Post Fire Department.
 - (b) Military Police.
 - (c) MEDDAC (IHS).
 - (d) DPW-ENRD.
 - (e) Post Safety Office.
- c. Discharge Response Procedures. The following general response procedures apply to discharges occurring on Fort Eustis or Fort Story. The primary functions of the Fire Department during discharge incidents include elimination of the source of the discharge, confining the release, making all internal and external notifications, and developing a clean-up plan. ENRD provides subject matter expertise and other assistance to the IC. Specific details are contained in the ICP.
- (1) Discovery of a discharge. Personnel who routinely work at sites storing, handling or using petroleum products, non-petroleum oils, or other hazardous substances or maintain a SAS or TSS will be trained by their chain of command/supervisors to know the locations where spills or leaks could occur and will inspect those areas regularly. Units and agencies responsible for potential spill sites will have inspection plans for the detection of spills and leaks at the sites. Personnel who observe a discharge incident (though not affiliated with the cause) are responsible for immediately notifying the Fire Department.
- (2) Notification. All spills (whether accidental or intentional), regardless of quantity responsible party or media affected, will be reported to immediately to Fire & Emergency Services (the Fire Department) either telephonically at 911 or the Fire Department's dispatch number (Fort Eustis: 878-1008, Fort Story 422-7141). The Fire Department will provide initial response and will notify ENRD, military police, Public Affairs and other applicable staff/commands. Fires or explosions involving wastes, petroleum products or other hazardous substances must also be reported to the Fire Department immediately by calling 911.

- (3) Initial response. The unit/activity responsible for the incident (responsible party) will contact the Fire Department immediately and then make every effort to confine the spill ONLY if it can be performed safely without risk to personnel. The Fire Department will provide the initial spill response team. The senior member of the Fire Department will assume control at the scene as the Incident Commander (IC) and determine the severity of the incident.
- (a) Non-emergency situations, small spills, spills onto shop floors and hardstands resulting in the generation of a limited quantity of easily containerized wastes. The IC will make this determination and accomplish one of the following:
 - Direct the responsible activity to clean up the spill and properly manage the generated wastes.
- Clean-up the spill, containerize the wastes and turn the wastes over to the responsible activity for proper disposal.
- Direct the responsible activity to assist with the clean up and containerization of wastes and to properly manage the wastes.
- When the responsible activity is not identified, clean-up the spill, containerize the wastes, label containers, and either transport the wastes to HWAF or leave wastes on-site and coordinate with the HWAF for later pick-up.
- (b) Emergency situations, situations that could potentially become emergencies, large spills, fires, explosions or discharges to water. The IC assumes control and takes appropriate action to stop the source of the spill, prevent further migration, protect the health & safety of personnel, protect water and other resources, and implement a clean-up plan. Additional information can be obtained from the ICP.
- (4) Reporting. The IC ensures that all internal and external telephonic notifications are made to local, state, federal, and US Army authorities in accordance with environmental regulations. Detailed reporting requirements are contained in the ICP. The IC (or his designated representative) will complete a Spill Report Form as part of its response actions and will forward this report to ENRD by the next working day. ENRD prepares all follow-up written reports based on the information provided in the Spill Report Form.
- (5) Disposal. Whenever practical, the spilled substance will be recovered. All non-recoverable material will be disposed of in accordance with Appendix H of this TCFE, Hazardous Waste Management.
- (6) Post-incident actions. The IC ensures that all response equipment and supplies used for spill response are cleaned and maintained or replenished. An after-action review with response personnel, ENRD, other installation activities and the responsible party is conducted to determine the effectiveness of response actions, identify any additional equipment or supply needs, and whether revision of the ICP is needed.
- (7) Additional support. The IC may request additional support during spill response. Support may include manpower and/or equipment from other installation activities. When response resource requirements exceed the capabilities of the installation, the IC may request contract support in dealing with an incident.
- (8) Responsible parties. Activities/organizations, which cause an incident, are referred to as the responsible party. Responsible parties are overall responsible for the incident and are responsible for all response, remediation, clean up, disposal and related costs. This typically includes costs for excavation of contaminated media, containerization and disposal of contaminated sorbents, materials and media, reimbursement of Fire & Emergency Services Division for consumable spill response supplies, replacement of durable response equipment damaged during the response, remedial actions, and any related contract support.
- (9) Unidentified responsible party. Spills where the responsible activity is not readily identifiable may be investigated by military police authorities to determine the responsible activity. If the responsible activity cannot be identified, the installation will be responsible for costs associated with clean up.

(10) Resources available for all spill responses. I located, that are available for handling discharges, are li	nstallation spill response equipment and supplies, and where sted in the ICP.
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Appendix U

Pesticides

U-1. Purpose. The purpose of this appendix is to explain the requirements for use of pesticides and herbicides at Fort Eustis and Fort Story.

U-2. Applicable Regulations.

- a. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
- b. DOD Directive 4150.7, Pest Management Program.
- c. AR 200-1, *Environmental Effects of Army Actions*, implements Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requirements which include determining the environmental suitability for a proposed real property transaction.
 - d. Fort Eustis/Story Pest Management Plan.
- **U-3. APPLICABILITY.** This Appendix applies to all DOD and US Army tenant activities, and all non-DOD tenants whose action takes place on Fort Eustis or Fort Story.
- **U-4. Policy.** It is USATC policy to:
 - a. Obtain all approved pesticides and herbicides through the Hazmart.
- b. Ensure only trained, licensed applicators obtain and use pesticides and herbicides in accordance with the Fort Eustis/Story Pest Management Plan. DPW and US Navy Public Works (Fort Story) are the only authorized pesticide/herbicide applicators.

Note: DPW and other activities may contract with outside pet control services. These services must meet all requirements stated in this regulation. Activities must obtain approval for their chemicals from the Installation Pest Management Coordinator (PMC) and the TRADOC PMC **before** pest control begins.

- c. Use pesticides and herbicides in an efficient, safe and environmentally sound manner.
- d. Use pesticides and herbicides in accordance with the Fort Eustis/Fort Story Pesticide Management Plan.
- e. Preclude use of pesticides and herbicides that are listed as Extremely Hazardous Substances (EHS) and Persistent, Bioaccumulative & Toxic substances under the Emergency Planning and Community Right To Know Act (EPCRA). An example of pesticides/herbicides precluded from use includes (but is not limited to) those containing pendimethalin (40487-42-1), aldrin (309-00-2), toxaphene (8001-35-2), isodrin (465-73-6), chlordane (57-74-9), heptachlor (76-44-8), methoxychlor (72-43-5) and others.
- f. Family housing residents may use pesticides and herbicides purchased at the PX or other garden shops. They may also use self-help to obtain mousetraps, ant traps etc to deal with minor problems. For major infestations, they should call in a service order to DPW desk, 878-4357.

U-5. Responsibilities.

a. Director, DPW. Maintain overall responsibility for pest management at Fort Eustis and Fort Story.

- b. Chief, Facilities Support Division, DPW.
- (1) Submit requests for new pesticides and herbicides (for use at Fort Eustis) to ENRD for review and approval/disapproval.
- (2) Ensure that contract personnel are receive annual training and hold valid, appropriate pesticide/herbicide application licenses.
 - c. US Navy Public Works.
- (1) Submit requests for new pesticides and herbicides (for use at Fort Story) to ENRD for review and approval/disapproval.
- (2) Ensure that contract personnel are training and hold appropriate pesticide application licenses for pesticide/herbicide application at Fort Story.
 - d. Chief, Environmental and Natural Resources Division, DPW.
 - (1) Serves as the Installation Pest Management Coordinator (or his designated representative).
 - (2) Approves all pesticides and herbicides used at Fort Eustis and Fort Story.
 - (3) Manages the Fort Eustis/Fort Story Pest Management Program.
 - e. All tenant activities.
- (1) Submit work order requests to DPW (Service Order Desk). See Appendix M, *Natural Resources*, of this regulation for further information for all pest control requirements.
 - (2) Ensure that subordinates do not obtain or use any type of pesticide or herbicide.

Appendix V1

Aboveground Storage Tank Management Daily and Weekly Inspection Requirements

V1-1. Purpose. This policy is to outline and ensure compliance with the regulatory requirements for daily and weekly aboveground storage tank (AST) inspections for regulated ASTs as specified by 9 VAC 25-91-130, Pollution Prevention Requirements.

V1-2. Definitions.

- a. Aboveground storage tank or AST: Any one or combination of tanks, including pipes, used to contain an accumulation of oil at atmospheric pressure, and the volume of which, including the volume of the pipes, is more than 90% above the surface of the ground.
- b. Oil: Oil of any kind and in any form, including, but not limited to, petroleum, and petroleum by-products, fuel oil, lubricating oils, sludge, oil refuse, oil mixed with other wastes, crude oils, and other liquid hydrocarbons regardless of specific gravity.
- c. Operator: Any person who owns, operates, charters by demise, rents, otherwise exercises control over or responsibility for an AST facility, or a vehicle, or a vessel.
- d. Regulated AST: An individual AST with a storage capacity greater than 660 gallons of petroleum based product and not meeting the exemptions listed in Section 3, Exclusions.
- e. Storage Capacity: The total capacity of an AST or a container, whether filled in whole or in part with oil, a mixture of oil, or mixtures of oil with nonhazardous substances, or empty.
- f. Vehicles: Any motor vehicle, rolling stock, or other artificial contrivance for transport whether self-propelled or otherwise, except vessels.
- g. Vessels: Every description of watercraft or other contrivance used as a means of transporting on water, whether self-propelled or other, and shall include barges and tugs.

V1-3. EXCLUSIONS.

- a. The following items are exempted from this policy brief:
 - (1) Vessels;
 - (2) Licensed motor vehicles, unless used solely for the storage of oil;
 - (3) An AST with a storage capacity of 660 gallons or less of oil;
- (4) A wastewater treatment tank system that is part of a wastewater treatment facility regulated under sections 402 or 307 (b) of the Federal Clean Water Act (33 USC section 1251 et seq.);
- (5) An AST used for the storage of products that are regulated pursuant to the Federal Food, Drug, and Cosmetic Act (21 USC Section 301 et seq);
- (6) An AST that is used to store hazardous wastes listed or identified under Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Solid Waste Disposal Act) (42 USC Section 6901 et seq.), or a mixture of such hazardous wastes and other regulated substances;

- (7) An AST that is used to store propane gas, butane gas or other liquid petroleum gases;
- (8) An AST used to store nonpetroleum hydrocarbon-based animal or vegetable oils;
- (9) A surface impoundment, pit, pond, or lagoon;
- (10) A stormwater or wastewater collection system;
- (11) Equipment or machinery that contains oil for operational purposes, including but not limited to lubricating systems, hydraulic systems, and heat transfer systems;
- (12) An AST used to contain oil for less than 120 days when (i) used in connection with activities related to the containment and cleanup of oil; (ii) used by a federal, state or local entity in responding to an emergency; or (iii.) used temporarily on-site to replace permanent capacity storage;
 - (13) Oil filled electrical equipment, including, but not limited to, transformers, circuit breakers or capacitors;
 - (14) A flow-through process tank;
 - (15) Oily water separators;
 - (16) An AST containing dredge spoils;
- (17) Piping or piping beyond the first valve from the AST that connects an AST with production process tanks or production process equipment.
- (18) An AST with a capacity of 5,000 gallons or less used for storing heating oil for consumptive use on the premises where stored.
- b. The provisions of Policy Brief Number 200-6, Hazardous Substance Discharge/Integrated Contingency Plan dated 23 April 2001 and USATC Integrated Contingency Plan applies to paragraphs 3.(1) through 3.(18).

V1-4. Procedures.

- a. The operator as defined can be more than one person and each operator shares joint responsibility for compliance.
- b. The operator, or a duly authorized representative, shall conduct a **daily** visual inspection of the AST as outline in section g. below. Daily inspections shall be conducted during normal duty hours. If the primary inspector is sick or on leave does not preclude the inspection being conducted. The activity should appoint someone to perform the daily/weekly inspections during the primary inspector's absence.
- c. The person conducting the daily inspection shall document completion of the inspection by initialing the Visual Daily Aboveground Storage Tank Inspection Record at the appropriate date (See Visual Daily Inspection Report at the end of this Appendix).
- d. Each operator of an AST shall institute inventory control procedures capable of detecting a significant variation of inventory. A significant variation shall be considered a variation in excess of 1% of the storage capacity of each individual AST. The following ASTs are exempt from inventory control procedures:
 - (1) AST totally off the ground with all associated piping off the ground.
- (2) AST with a capacity of 5,000 gallons or less located within a building or structure designed to fully contain a discharge of oil.

(3) Below is a list of regulated ASTs at Fort Eustis and Fort Story and denotes those ASTs which require inventory control and testing for significant variation.

Fort Eustis Aboveground Storage Tank Inventory

	Building	Size (gallons)	Regulated AST	Contents	Description
1	451	20,000	yes	Used Oil	Bilge Water System
2	460	1,000	yes	Diesel	Diesel Engine Training
3	705	1,000	yes	Diesel	Generator
4	2116	4,000	yes	No. 2 Fuel Oil	Tanks Direct Fire Guard tanks
5	2116	4,000	yes	No. 2 Fuel Oil	Tanks Direct Fire Guard tanks
6	2451	30,000	yes	JP8	Felker Tank Farm
7	2451	30,000	yes	JP8	Felker Tank Farm
8	2702	1,000	yes	Used Oil	Convault
9	3307	1,000	yes	JP8	Convault

Fort Story Aboveground Storage Tank Inventory

	Building	Size (gallons)	Regulated AST	Contents	Description
1	765	3,000	yes	Diesel	Peak Shaving Generator

- e. Each secondary containment dike or berm shall be maintained.
- f. Each operator shall institute safe fill, shutdown, and transfer procedures or equivalent measures that will ensure that spills resulting from tank overfills or other product transfer operations do not occur.
- g. All activities of Fort Eustis and Fort Story, to include tenant activities, are required to comply with Policy Brief Number 200-6, Hazardous Substance Discharge/Integrated Contingency Plan and the USATC Integrated Contingency Plan (ICP). Tenants and activities are responsible for using best management practices to prevent discharges. Best management practices are measures to prevent spills and leaks, and control migration of discharges. This includes (but not limited to) use of secondary containment placed around or underneath potential sources of releases and protection of drains and other water sources.
- (1) The AST facility operator is responsible for a spill (or anyone observing a spill incident) must contact Fire & Emergency Services immediately at 911 or 878-1008 (Fort Eustis) and 911 or 422-7456 (Fort Story), regardless of quantity discharged. Fire & Emergency Services is the only authorized agent to report incidents to federal, state and local authorities.
 - (2) All AST facility operator activities will provide support to spill response actions IAW the ICP.
- (3) All AST facility operators shall ensure appropriate spill kits are on hand at all petroleum storage locations.

- h. The visual daily inspection shall include the following:
- (1) A complete walk through of the facility property in the areas where the AST is staged to ensure that no hazardous conditions exist.
 - (2) An inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils.
- (3) A check of the berm or dike area for excessive accumulation of water and to ensure the dike or berm manual drain valves are secured.
 - (4) A visual inspection of the exterior tank shell to look for signs of leakage or damage.
 - (5) An evaluation of the condition of the AST and appurtenances.
- i. The operator or duly authorized representative shall conduct a **weekly** inspection of the facility using the Weekly AST Inspection Record (See Weekly AST Inspection Report at the end of this Appendix).
- (1) The Weekly AST Inspection Record shall be maintained at the facility and provided to the Environmental and Natural Resources Division AST Program Manager upon request.
- (2) The Weekly AST Inspection Record shall be initialed and dated by the AST facility operator or person conducting the inspection. The Weekly AST Inspection Record shall become part of the AST facility record.
 - (3) The weekly inspections shall include the following:
 - (a) Containment dike or berm is in satisfactory condition.
 - (b) Containment area is free of excess standing water or oil.
 - (c) Gate valve used for emptying containment area is secured.
 - (d) Containment area/base of tank is free of high grass, weeds, and debris.
- (e) Tank shell surface, including any peeling areas, welds, rivets/bolts, seams, and foundation, visually inspected for areas of rust and other deterioration.
 - (f) Ground surface around tanks and containment structures and transfer areas checked for signs of leakage.
 - (g) Leak detection equipment in satisfactory condition.
 - (h) Separator or drainage tank in satisfactory condition.
 - (i) Tank water bottom draw offs not in use are secured.
 - (i) Tank fill valves not in use are secured.
 - (k) Valves inspected for signs of leakage or deterioration.
 - (l) Inlet and outlet piping and flanges inspected for leakage.
 - (m) All tank gauges have been inspected and are operational.
- j. The AST Inspection Discrepancy Report (See AST Inspection Discrepancy Report at the end of this Appendix) shall be used to annotate discrepancies noted during the daily and weekly inspections. A copy of the discrepancy report shall be provided to the ENRD AST Program Manager within two working days.
- **V1-5. Training.** Personnel conducting daily and weekly inspections shall be properly trained. The ENRD AST Program Manager shall establish a training program. The training program established shall be maintained to reflect current conditions of the facility. Personnel who will be conducting the inspections shall receive the training prior to conducting any inspections.
 - a. Training for personnel performing daily and weekly inspections shall address at a minimum:
- (1) Basic information regarding occupational safety, hazard recognition, personnel protection, and facility operations.
 - (2) The procedure to be followed in conducting the daily visual and weekly AST inspections.

- (3) The procedure to be followed upon recognition of a hazard or the potential for a hazard.
- (4) The procedure for evaluating the condition of the AST and appurtenances.
- b. The ENRD AST Program Manager shall train AST facility personnel on any changes to the contents of the initial training program or every three years and document this training in the facility records.
- c. As with any new process or procedure, a commitment to effect change and strong command support are essential to its success. Commanders and directors must play an active role in assuring compliance with this policy.

V1-6. Recordkeeping and Access to AST Facilities.

- a. Each operator of an AST facility subject to this policy brief shall maintain the following records:
 - (1) All records relating to all required measurements and inventory.
 - (2) All records relating to required tank/pipe testing;
- (3) All records relating to spill events and other discharges of oil from the facility; to include inspection discrepancy report (See AST Inspection Discrepancy Report at the end of this Appendix).
 - (4) All supporting documentation for developed contingency plans;
 - (5) All records relating to training of individuals; and
- (6) These records shall be kept by the AST operator of a facility at the facility and provide the ENRD AST Program Manager a copy of the records at the end of each calendar year. Submit the previous year records to the ENRD AST Program Manager by the second week in January in the new calendar year, i.e., January 10, 2002. The records shall be kept for a period of no less than five years unless otherwise indicated.
- (7) Upon request each operator shall make these records available to the Virginia Department of Environmental Quality (VDEQ), and to the director or coordinator of emergency services for the locality in which the AST facility is located or to any political subdivision within one mile of the facility may request to see AST records. ENRD will coordinate with each facility operator and provide the requested records.
- b. Operator shall maintain all records relating to compliance with this chapter for a period of no less than five years from the date the board receives notice of the closure unless otherwise indicated. These records shall be made available to the VDEQ at any time upon request.
- **V1-7. References:** Virginia Department of Environmental Quality, Water Division, Office of Spill Response and Remediation regulation 9 VAC 25-91-10 et seq, Facility and Aboveground Storage Tank (AST) Regulation, Policy Brief Number 200-6, Hazardous Substances Discharges/Integrated Contingency Plan and USATC Integrated Contingency Plan (ICP).

VISUAL DAILY ABOVEGROUND STORAGE TANK (AST) INSPECTION RECORD

Building:

Tank #:

Activity:

Inspect	or's Nan	ne:					_	Year: _				
	ST Inspe	ctor must	put his/he	er initial ii	n the appro	opriate bo	x indicati	ng compl	etion of in	nspection.		
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- 1. A complete walk-through of the facility property in the area of the aboveground storage tank (AST) to ensure that no hazardous conditions exist.
- 2. An inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils.
- 3. Check the berm or dike area for excessive accumulation of water and to ensure the dike or berm manual drain valves are secured.
- 4. Perform a visual inspection of the exterior tank shell to look for signs of leakage or damage.
- 5. An evaluation of the condition of the AST and the tank's associated equipment
- 6. If a discrepancy is noted during the daily inspection check, complete the AST Discrepancy Report and contact the Environmental and Natural Division, DPW at 878-4123.

WEEKLY ABOVEGROUND STORAGE TANK (AST) INSPECTION RECORD

Activ	Activity:					Building:				Tank #:		
Inspector's Name: Year:												
The AST	The AST Inspector must put his/her initial in the appropriate box indicating completion of inspection.											
Day of Month	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ост	NOV	DEC
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Day of Month	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ост	NOV	DEC
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- 1. Containment dike or berm in satisfactory condition.
- 2. Containment area free of excess standing water or oil.
- 3. Gate valves used for emptying containment areas secured.
- 4. Containment area/base of tank free of high grass, weeds, and debris
- 5. Tank shell surface visually inspected for areas of rust and other deterioration.
- 6. Ground surface around tanks and containment structures and transfer areas checked for signs of leakage.
- 7. Leak detection equipment in satisfactory condition.
- 8. Separator or drainage tank in satisfactory condition.
- 9. Tank water bottom draw offs not in use are secured.
- 10. Tank fill valves not in use are secured.
- 11. Valves inspected for signs of leakage or deterioration.
- 12. Inlet and outlet piping and flanges inspected for leakage.
- 13. All tank gauges have been inspected and are operational.

Aboveground Storage Tank Inspection Discrepancy Report

Date:	-		
Activity:		-	
Building:	Tank:		
Discrepancy:			
Corrective Action:			

Appendix V2

Underground Storage Tank Management Daily and Weekly Inspection Requirements

V2-1. Purpose. This policy is to outline and ensure the regulatory requirements for underground storage tank (UST) inspections as specified by 9 VAC 25-580-40, Permitting and Inspection Requirements.

V2-2. Definitions.

- a. Underground storage tank or UST: Any one or combination of tanks, including underground pipes, used to contain an accumulation of regulated substance, and the volume of which, including the volume of the underground pipes, is 10% or more beneath the surface of the ground.
- b. Ancillary Equipment: Any devices including, but not limited to, such devices as piping, fittings, flanges, valves, and pumps.
 - c. Deferral: Delaying or postponing.
- d. Maintenance: The normal operational upkeep to prevent an underground storage tank system from releasing product.
- e. Motor Fuel: Petroleum or petroleum based substance that is motor or aviation gasoline, No.1 or No. 2 diesel fuel, or any grade of gasohol and is typically used in the operation of a motor engine.
 - f. Operator: Any person in control of, or having responsibility for, the daily operation on the UST system.
- g. Overfill release: A release that occurs when a tank is filled beyond its capacity, resulting in a discharge of the regulated substance to the environment.
- h. Petroleum UST System: An underground storage tank system that contains petroleum or a mixture of petroleum de minimis quantities of other regulated substances. Such systems include those containing motor fuels or jet fuels, distillate fuel oils, lubricants, petroleum solvents, and used oils.
 - i. Pipe or piping: A hollow cylinder or tubular conduit that is constructed of non-earthen materials.
- j. Regulated Substance: An element, compound, mixture, solution, or substance that, when released into the environment, may present substantial danger to the public health or welfare, or the environment.
- k. Release: Any spilling, leaking, emitting, discharging, escaping, leaching or disposing from an UST into ground water, surface water or subsurface soils.
- 1. Release detection: Determining whether a release of a substance has occurred from the UST system into the environment or into the interstitial space between the UST system and its secondary barrier or secondary containment around it.
- m. Repair: To restore a tank or UST system component that has caused a release of product from the UST system.

V2-3. Exclusions.

- a. The requirements of this policy do not apply to:
- (1) Any UST system holding hazardous wastes listed or identified under Subtitle C of the Solid Waste Disposal Act (33 USC section 1251 et seq.), or a mixture of such hazardous waste and other regulated substances;
- (2) Any wastewater treatment tank system that is part of a wastewater treatment facility regulated under sections 402 or 307 (b) of the Clean Water Act;
- (3) Equipment or machinery that contains regulated substances for operational purposes such as hydraulic lift tanks and electrical equipment tanks;
 - (4) Any UST system whose capacity is 110 gallons or less;
 - (5) Any UST system that contains a de minimis concentration of regulated substances;
 - (6) Any emergency spill or overflow containment UST system that is expeditiously emptied after use;
 - (7) UST containing heating oil.

V2-4. Procedures.

- a. The operator as defined can be more than one person and each operator shares joint responsibility for compliance.
- b. The operator, or a duly authorized representative, shall conduct a monthly inspection of the UST (see enclosure 1) and as outlined in section g below.
- c. The person conducting monthly inspections shall document any UST discrepancy and contact the Environmental and Natural Resources Division (ENRD) UST Program Manager at 878-4123 to report the discrepancy and for guidance.
- d. Each operator shall institute safe fill, shutdown, and transfer procedures or equivalent measures that will ensure that spills resulting from tank overfills or other product transfer operations do not occur.
- e. All activities of Fort Eustis and Fort Story, to include tenant activities, are required to comply with the Integrated Contingency Plan (ICP) dated April 23, 2001. Incorporate and adhere to the best management practices to prevent petroleum based product spills.
- (1) The UST facility operator responsible for a spill (or anyone observing a spill incident) must contact Fire & Emergency Services immediately at 911 or 878-1008 (Fort Eustis) and 911 or 422-7456 (Fort Story) regardless of quantity discharged. Fire & Emergency Services is the only authorized agent to report incidents to federal, state and local authorities.
 - (2) All UST facility operator activities will provide support to spill response actions IAW the ICP.
- (3) All UST facility operators shall ensure appropriate spill kits are on hand at all petroleum storage locations.
 - f. The monthly inspection shall include the following:
- (1) A complete walk through of the facility property in the area where the UST is staged to ensure that no hazardous conditions exist.
 - (2) An inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils.

- (3) A check of the spill containment manhole (catchment basin) for excessive accumulation of water.
- (4) A visual inspection of the fill pipe and surrounding areas to look for signs of leakage or damage.
- (5) An evaluation of the condition of the UST and appurtenances.
- (a) Ensure the automatic tank gauging system (ATG) for the tank and piping is operating properly.
- (b) Spill Buckets are clean and empty.
- (c) Overfill alarm is operating properly.
- (d) Fill and monitoring port covers and caps are tightly sealed and locked.
- (e) Ground surface around fill ports checked for signs of leakage.
- (f) Spill and overfill response supplies are adequate, no visible indication of deterioration or improper functioning.
- (g) Dispenser hoses, nozzles, and breakaways for loose fittings, deterioration, obvious signs of leakage, and damage.
- (h) Inspect dispenser and dispenser sump piping, fittings, and couplings are inspected for signs of leakage or deterioration.
 - (i) Remove any debris from the sump.
 - (j) Piping sumps are inspected for signs of leakage or deterioration.
 - (k) Inspect all tank gauges to ensure they are operational.
- g. The monthly UST Inspection Record shall be maintained at the facility and provided to the ENRD UST Program Manager upon request.
- h. The monthly UST Inspection Record shall be signed and dated by the UST facility operator or person conducting the inspection. The monthly UST Inspection Record shall become part of the UST facility record.
- **V2-5. Training.** Personnel conducting monthly inspections shall be properly trained. The training program established shall be maintained to reflect current conditions of the facility. Personnel who will be conducting the inspections shall receive the training prior to conducting any inspections.
 - a. Training for personnel performing monthly inspections shall address at a minimum:
- (1) Basic information regarding occupational safety, hazard recognition, personnel protection, and facility operations.
 - (2) The procedure to be followed in conducting the UST inspections.
 - (3) The procedure to be followed upon recognition of a hazard or the potential for a hazard.
 - (4) The procedure for evaluating the condition of the UST and appurtenances.
- b. The ENRD UST Program Manager shall train UST facility personnel on any changes to the contents of the initial training program or every three years and document this training in the facility records.

c. As with any new process or procedure, a commitment to effect change and strong command support are essential to its success. Commanders and directors must play an active role in assuring compliance with this policy.

V2-6. Recordkeeping and Access to UST Facilities.

- a. Each operator of an UST facility subject to this policy brief shall maintain the following records:
 - (1) Monthly UST Inspection Record;
 - (2) Documentation of operation of corrosion protection equipment;
 - (3) Documentation of training;
 - (4) Documentation of UST system repairs;
 - (5) Recent requirements with release detection requirements;
 - (6) Results of the site investigation conducted at permanent closure.
- (7) These records shall be kept by the UST operator of a facility at the facility and provide the ENRD UST Program Manager a copy of the records at the end of each calendar year. Submit the previous year records to the ENRD UST Program Manager by the second week in January in the new calendar year, i.e., January 10, 2003. The records shall be kept for a period of no less than five years unless otherwise indicated.
- (8) Upon request each operator shall make these records available to the Virginia Department of Environmental Quality, and to the director or coordinator of emergency services for the locality in which the UST facility is located or to any political subdivision within one mile of the facility.
- **V2-7. References.** Virginia Department of Environmental Quality, Water Division, Office of Spill Response and Remediation regulation 9 VAC 25-580-40, Underground Storage Tanks: Technical Standards and Corrective Action Requirements.

MONTHLY UNDERGROUND STORAGE TANK (UST) INSPECTION RECORD

Activity:	Building #:	Tank #:
UST Inspector's Name:		Year :
Date of Inspection		
Automatic Tank Gauging System: Inspect for proper operation.		
Spill Buckets: Ensure spill buckets are clean and empty.		
Overfill Alarm: Inspect for proper operation. Can a delivery person hear or see the alarm when it alarms?		
Ground Surface around Fill Port : Check for signs of leakage.		
Fill and Monitoring Ports: Inspect all fill/monitoring ports and other access points to make sure that the covers and caps are tightly sealed and locked.		
Spill and Overfill Response Supplies: Inventory and inspect the emergency spill response supplies. If the supplies are low, restock the supplies. Inspect supplies for deterioration and damage.		
Dispenser Hoses, Nozzles, and Breakaways: Inspect for loose fittings, deterioration, obvious signs of leakage, and damage.		
Dispenser and Dispenser Sumps: Open each dispenser and inspect all visible piping, fittings, and couplings for any signs of leakage. If any water or fuel is present, remove it and dispose of it properly. Remove any debris from the sump.		
Piping Sumps: Inspect all visible piping, fittings, and couplings for any signs of leakage. If any water or product is present, remove it and dispose of it properly. Remove any debris from the sump.		
Tank Gauges: Inspected and ensure they are proper operation.		

Initial each box below the date of the inspection which will indicate that the device/system was inspected and OK on that date.

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Appendix W

Drinking Water Resource Management

W-1. Purpose. This appendix establishes policy, responsibilities and procedures to ensure that all water supplies destined for public consumption be pure water.

W-2. Key Applicable Regulations.

- a. The Safe Drinking Water Act (SDWA) regulates the safety of drinking water and applies to public water systems in the country. Under SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. The Commonwealth of Virginia has primacy for enforcing compliance with the SDWA.
- b. The governing Commonwealth of Virginia regulation affecting Fort Eustis and Fort Story's drinking water is 12 VAC 5-590, Virginia Waterworks Regulations.
- c. Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, mandates compliance with the SDWA, and applicable state and local requirements.

W-3. Policy.

- a. Assist the installation mission by ensuring that our training environment will maintain its high quality and continue to support training operations through time; protect human health by providing clean and healthful drinking water; and ensure that Fort Eustis and Fort Story achieves and maintains compliance with all applicable environmental laws and regulations. This policy applies to all water distribution systems at Fort Eustis and Fort Story.
- b. Conserve water resources through the use of water-saving techniques, including devices, fixtures, methods, and recycle and reuse technology.
 - c. Provide clean, safe drinking water.
 - d. Cooperate with federal, state, regional and local authorities in local water planning efforts.
 - e. Monitor, evaluate and minimize any adverse effects of mission activities on water resources and water quality.

W-4. Background.

- a. The following is some background information on the Fort Eustis water distribution system:
- (1) Fort Eustis is a consecutive water system purchasing water from the City of Newport News Waterworks. The water distribution system is comprised of RPZ valves, a booster pump station, over 46 miles of predominantly unlined cast iron pipe, storage facilities which provide a total storage capacity of 1,081,000 gallons (700,000 gallons domestic and 381,000 gallons fire), and two emergency wells that can be connected to the system should the city's water supply fail.
- (2) Most water quality monitoring is conducted by Newport News Waterworks; however, Fort Eustis is required to conduct monthly bacteriological monitoring, quarterly trihalomethane (THM)s monitoring, and lead and copper monitoring every three years. The current bacteriological monitoring plan, approved by the Virginia Department of Health, requires Fort Eustis to sample fifteen (15) designated sites per month.

- (3) In 1998, after many years of using chlorine as the only disinfectant in their water treatment process, Newport News Waterworks converted to chloramines, a combination of chlorine and ammonia. The conversion was made to reduce the levels of trihalomethanes, a by-product of drinking water chlorination and suspected carcinogen, and also reduce the taste and odor associated with chlorine. In preparation for the conversion to chloramines, Fort Eustis, with assistance from members of US Army Center for Health Promotion and Preventive Medicine (USACHPPM) and McDonald Army Community Hospital, Preventive Medicine Services, flushing of the distribution system was conducted and hydrants were flowed to ensure chloraminated water was drawn to all areas of the distribution system. Monitoring was expanded to include quarterly heterotrophic plate counts, nitrates, and nitrates at various locations within the distribution system.
- (4) During the month of July 1999, Fort Eustis received four positive total coliform samples. Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, bacteria may be present. This amount exceeded the maximum contaminant level (MCL) for total coliform and a Notice of Violation (NOV) was issued by the Virginia Department of Health. Fort Eustis continued to exceed the MCL for total coliform for the months of August November 1999. A total of four NOVs were received for 1999, one of which was issued for a two-month sampling period. All NOVs were resolved by publishing the mandatory public notification in the installation newspaper and disseminating copies of the notification to all activities on the mailing distribution system.
- (5) In November 2000, Fort Eustis was placed on the Environmental Protection Agency (EPA) list of Significant Non-Compliers for these repeated violations. In March 01, Fort Eustis entered into a Consent Order with the VDH.
- (6) During FY00, Fort Eustis was funded for repairs and assessments on the water distribution system. Such assessments included a distribution system storage capacity analysis, inspection of all water storage tanks, a water quality monitoring plan, development of a unidirectional flushing program, a leak detection survey, preparation of an operation and maintenance plan, development of a hydraulic/water quality model, and evaluation of the existing Facility Monitoring System (FMS). Corrective actions taken based on assessment findings include the repair/replacement of deficient altitude and system isolation valves, repair of leaks which reduced the average daily water consumption by approximately 300,000 gallons per day, installation of additional sampling stations for monitoring purposes, installation of automatic flushing devices to maintain disinfectant residuals in areas with extended detention times, and automation of the booster by-pass valve. Assessments concluded that previous tank management schemes, excess storage of water, water age within the distribution system, and the continual deterioration of an aged and poorly maintained water distribution system are contributing factors negatively impacting the quality of water being delivered to Fort Eustis customers.
- (7) In FY01 and FY02, Fort Eustis continued to upgrade the water distribution system. Projects included the replacement of approximately 19,800 feet of 6", 8" and 10" water lines and the demolition of one 200,000-gallon water storage tank.
 - b. The following is some background information on the Fort Story water distribution system:
- (1) Fort Story purchases potable water from the City of Norfolk that is delivered via the City of Virginia Beach distribution system. Water enters the Fort Story distribution system via a 12-inch diameter main, passing through two-meter vaults located at the east and west gates. The meter vaults are owned by the City of Norfolk. The distribution system is comprised of approximately 117,000 linear feet of cast iron, polyvinyl chloride, and some asbestos cement piping, ranging in size from less than 2 inches to 12 inches in diameter, with the latest major upgrades taking place in 1989. A 600,000 gallon elevated storage tank provides storage.
- (2) Fort Story is classified as a Class V waterworks by the VDH. Operation and maintenance of the system is currently handled by the Navy Public Works Center through an Inter-Service Support Agreement.

- (3) In accordance with VDH waterworks regulations, Fort Story has established a bacteriological monitoring program for the on-post water distribution system. Six sampling locations have been approved; however, the monitoring program requires that only three of these locations be sampled on rotation each month. The collection and analysis of monthly bacteriological samples is conducted by the Navy Public Works Center Environmental Laboratory Services. Fort Story is also required to monitor for lead and copper on a three-year cycle. Lead and copper samples are collected by facility occupants and analyzed by a contracted laboratory.
- (4) During the fall of 2000, South Hampton Roads water utilities, including Norfolk and Virginia Beach, converted from chlorine to chloramines in their disinfection process. This conversion was made to improve the quality of drinking water and meet new federal and state regulations governing disinfection byproducts. In preparation for the conversion, the Navy Public Works Center implemented a comprehensive water line flushing program throughout Fort Story
- **W-4. Responsibilities.** Responsibilities for compliance with the above stated policy items, and with the goals established by the SDWA, and other federal, state and local laws and regulations are stated below.
- a. Directorate of Public Works (DPW) will exercise overall staff responsibility for drinking water management and ensuring compliance with applicable laws and regulations.
 - b. The Environmental and Natural Resources Division (ENRD), DPW, will:
- (1) Coordinate with federal, state, regional, and local agencies and authorities to ensure safe pure drinking water quality.
- (2) Review master plans, construction plans, and other activities for impacts on the drinking water distribution system.
 - (3) Ensure compliance with the Virginia Department of Health Consent Order issued on 15 March 2001.
- (4) Apply for and obtain applicable permits required by federal, state and local regulations, including Construction Permits as specified by 12 VAC 5-590-190, Permits. No owner or other person shall cause or allow the construction or change in the manner of transmission, storage, purification, treatment, or distribution of water (including the extension of water pipes for the distribution of water) at any waterworks or water supply without a written construction permit from the Virginia Department of Health.
- (5) Coordinate with other DPW divisions in the identification, budgeting, reporting, engineering, design and construction of water distribution projects.
- c. The Public Works Division (PWD) will operate the Fort Eustis' water distribution system in accordance with all applicable laws and regulations.
- d. The Navy Public Works Center through an Inter-Service Support Agreement will operation and maintain the Fort Story water distribution system in accordance with all applicable laws and regulations.
- **W-5. Drinking Water Regulations, Standards And Procedures.** The actions described below are major aspects of drinking water management on Fort Eustis and Fort Story. Compliance with applicable requirements is mandatory for all organizations and personnel on the installations. Additional details are available from ENRD, DPW.
 - a. Protection of Drinking Water Quality.
 - (1) Drinking water quality will be managed by the ENRD.
 - (2) Cross-connection control (backflow protection).

- (a) All installations of backflow protection devices shall be made in accordance with applicable standards and procedures.
- (b) No connection will be made between a potable water line and any other line or container carrying a non-potable fluid, such that it is possible for the non-potable fluid to enter the potable system by backflow.
- (c) Annual testing of backflow prevention devices in buildings and facilities maintained by PWD will be coordinated by the ENRD. All other water users on Fort Eustis and Fort Story will ensure completion of the testing and will submit results to ENRD.

b. Water Conservation.

- (1) Fort Eustis and Fort Story are consecutive water systems with the City of Newport News and the City of Norfolk, respectively. Both installations will enforce/mirror any water conservation advisories or water restrictions imposed by the City of Newport News or the City of Norfolk.
- **W-6. Reports And Investigation Of Complaints.** Complaints about drinking water quality or other types of water pollution will be submitted to ENRD (878-4123). Complaints from off-post sources will be referred to the Public Affairs Office (878-4920). Inquiries from state or federal agencies regarding pollution reporting or investigations will be referred to the ENRD.

Appendix X

Wastewater and Storm Water Management

1. Purpose. This appendix establishes policy, responsibilities and procedures for the control and abatement of water pollution.

2. Key Applicable Regulations.

- a. The Federal Water Pollution Control Act, commonly known as the Clean Water Act (CWA), governs the control of water pollution in the nation. The CWA objective is to restore and maintain the chemical, physical and biological integrity of the nation's waters.
- b. The National Pollutant Discharge Elimination System (NPDES) permit program requires that wastewater/storm water discharges into water bodies from point sources such as storm water runoff from industrial activities be regulated by discharge permit.
- c. Virginia Erosion and Sediment Control Law, Regulation and Certification Regulation (VESCL&R) requires that all construction projects involving land disturbing activities implement Best Management Practices (BMP) to reduce and/or eliminate
 - d. 9 VAC 30-50 Code of Virginia governs the discharge of wastewater and storm water.
 - e. 9 VAC 25-180-10 Code of Virginia governs General Construction Storm Water Permits.
- f. Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, mandates compliance with the CWA and applicable state and local requirements.

3. Policy.

- a. Assist the installation mission by ensuring that our training environment will maintain its high quality and continue to support training operations; ensure that storm water and wastewater meet or exceed water quality standards; protect beneficial uses of all surface water bodies; and ensure that Fort Eustis achieves and maintains compliance with all applicable environmental laws and regulations. This policy applies to:
- (1) All bodies of water, natural or manmade, including reservoirs, pools, ponds, lakes, wells, wetlands, streams, rivers, ditches and underground aquifers.
 - (2) All wastewater collection systems, treatment facilities and effluents.
- (3) Monitor, evaluate and minimize any adverse effects of mission activities on water resources and water quality.
- **4. Responsibilities.** Responsibilities for compliance with the above stated policy items, and with the goals established by the CWA and other federal, state and local laws and regulations are stated below.
 - a. The Directorate of Public Works, Facility Support Division will:
 - (1) Manage the infrastructure in compliance with all federal, state and local regulations.
 - (2) Operate and maintain all pretreatment facilities.
 - (3) Submit the required discharge monitoring report to ENRD.

- b. The Environmental and Natural Resources Division (ENRD) will:
 - (1) Coordinate wastewater and storm water pollution abatement, and surface water quality.
- (2) Conduct water monitoring at s elected representative locations to evaluate impacts of training and other activities on water quality installation-wide.
- (3) Review master plans, construction plans and activities, and other activities for controls to surface water runoff that minimize erosion and the discharge of pollutants.
 - (4) Conduct studies, analyze data, identify and eliminate/minimize all sources of pollutants.
- (5) Develop and coordinate policies and procedures for water resources management that reflect Army guidance and pertinent provisions of water pollution control laws.
- (6) Apply for and obtain applicable permits required by federal, state and local regulations, including NPDES discharge permits and Hampton Roads Sanitation District permits.
 - (7) Coordinate with federal, state, regional, and local water quality control agencies and authorities.
 - (8) Provide technical guidance to installation and sub-installation.
- (9) Develop long-range programs and policies for wastewater treatment to achieve water quality objectives and goals of the CWA and other pertinent laws and regulations.
- (10) With Facilities Support Division and Business Management Division, manage the identification, budgeting, reporting, engineering, design and construction of projects intended to control and monitor wastewater discharges in accordance with applicable federal, state, regional and local water quality standards.
- c. The Facilities Support Division will operate wastewater treatment facilities in accordance with all applicable laws and regulations, and will:
- (1) With ENRD, develop long-range programs and policies for wastewater treatment to achieve water quality objectives and goals of the CWA and other pertinent laws and regulations.
- (2) Submit discharge monitoring reports (DMR) and other required reports in accordance with permit schedules.
- (3) Construct, operate, and maintain wastewater treatment facilities, storm water treatment facilities, and their associated collection systems at Fort Eustis in accordance with applicable laws, regulations and directives.
 - d. The Engineering Services Division will:
 - (1) Maintain inventories and drawings of storm water and wastewater collection systems.
- (2) Coordinate with ENRD for proposed projects regarding wastewater and storm water to allow notification of federal and state regulatory agencies comment.
- (3) Contact ENRD (878-4123) for guidance when any proposed action or project has the potential (or if there is a question as to the potential) to affect a water resource.
- **5.** Water Quality Regulations, Standards And Procedures. The actions described below are major aspects of water resource management on Fort Eustis. Compliance with applicable requirements is mandatory for all organizations and personnel on the installation. Additional details are available from ENRD.

- a. Water Pollution Abatement.
 - (1) Storm water pollution prevention:
- (a) ENRD will conduct annual inspections of unit/agency facilities and activities in the cantonment area for storm water pollution prevention practices. A report of the inspection will be provided to the unit/agency for information and correction of any deficiencies noted.
 - (b) Storm water pollution prevention training will be provided for all AECs.
- (c) Vehicle maintenance and washing activities are not permitted in housing areas, barracks areas, or parking lots.
 - (d) All exterior vehicle washing will be conducted at an approved vehicle washracks on post.
 - (2) Control of industrial wastewater discharges:
- (a) All new discharges from industrial processes into the sanitary wastewater system require approval by ENRD.
- (b) Operation of grease racks and oil/water separators, and other motor pool activities that could potentially cause water pollution will take all practical measures to eliminate all unpermitted discharges.
- (c) Water and soap from dining facility outdoor washing of garbage cans, field kitchen equipment or other items will not be allowed to run into streets or storm drains. Only that area designated for washing which empties into the sanitary wastewater system will be used. Grease and garbage will not be dumped into storm drains.
 - (d) No discharges will be allowed into the sanitary or storm water systems without prior approval from ENRD.
- (e) Hazardous materials will be stored and handled in a manner that will minimize the potential for spills which could release material into storm drains or the sanitary wastewater system. The storage and handling of hazardous materials is prescribed in Appendix G, *Hazardous Material Management*, this regulation.
- (f) Control of discharges to the sanitary wastewater system. All connections that discharge into the sanitary wastewater system require approval by ENRD.
 - (3) Sedimentation and Erosion Control:
 - (a) ENRD will provide program administration.
- (b) All projects involving land disturbing activities greater than 2,500 square feet will develop and submit a Sedimentation and Erosion Control Plan. The plan must be developed in accordance with the Virginia Erosion and Sedimentation Control Handbook, 3rd Edition 1992 and 2.d. of this appendix.
 - (c) Two copies of the plan will be submitted to ENRD for review and approval.
 - (d) The project manager for the project will submit the plan 45 days prior to commencement of construction.
- (e) Upon review, ENRD will provide a letter of approval or a response outlining deficiencies and what is required for an approved plan.
- (f) Land disturbing activities will not be initiated prior to plan approval. Failure to comply my result in a Stop Work Order and/or potential fines.
 - (g) Exemption to this requirement will only be granted by the plan approving authority.

- (h) The project manager will maintain a copy of the approved plan on site.
- (i) Once the plan has been approved and prior to commencement of construction, control measures such as silt fence and tree protection may be installed.
- (j) Once the control measures have been installed, they must be maintained in accordance with 2.c. of this appendix.
- (k) Responsibilities for maintenance and inspection of control structures must be addressed in the plan. Inspections are required on all projects. Inspection will be performed at a minimum of bi-weekly, within 48 hours of a runoff producing storm event and at project completion.
 - (1) Inspection records will be maintained at the site.
 - (m) ENRD will perform periodic inspection of all projects.
 - (4) Storm Water General Construction Permits
- (a) Construction activities greater than five acres (Note: In March 2003, the size will be changed to one acre in size) are required to have a General Construction Permit prior to commencement of land disturbing activity.
- (b) The organization responsible for physical construction is responsible for obtaining the permit from the Virginia Department of Environmental Quality. Addition information can be found in the Permitting Section of this regulation.
- (c) A copy of the permit and Termination Notice issued at completion of project will be forwarded to DPW, ENRD (ATTN: Storm Water Programs).

PERMITS

Hampton Roads Sanitation District (HRSD) Permit

The HRSD permit regulates all domestic and industrial wastewater generated and discharged into the sanitary sewer collection system at Forts Eustis and Story. Domestic discharges are broadly characterized, while industrial discharges are specifically identified and permitted. All changes in industrial discharges must be approved by HRSD prior to discharge into the sanitary sewer. Discharges that have not been approved will result in a Notice of Violation for unpermitted or illegal discharge. In addition to the NOV, HRSD mad assess fines based upon the severity of the activity.

The permit period is three years and the application for renewal must be submitted six months prior to expiration of the permit.

Virginia Pollutant Discharge Elimination System (VPDES) Permit

The VPDES permit allows Fort Eustis and Story to discharge storm water into waters of the state. Each discharge point is classified as residential or industrial. Industrial activities are categorized and based upon activity may be a monitored site. During rain events, samples are collected and analyzed for parameters set by the Virginia Department of Environmental Quality. The permit further requires the development, implementation and annual update of a Storm Water Pollution Prevention Plan. This plan identifies all industrial activities and the Best Management Practices employed to reduce or eliminate contaminants into state waters.

The permit period is four years and the application for renewal must be submitted six months prior to expiration of the permit.

Storm Water General Construction Permit

In accordance with 9 VAC 25-180-10, the aforementioned permit must be obtained for construction activities greater than 5 acres in size. (Note: In March 2003, the size will be changed to one acre in size.) The permit shall be obtained from the Virginia Department of Environmental Quality (DEQ), Attention: Carolyn Putnum at (757) 518-2000. The application for this permit can be obtained from the DEQ website, www.deq.state.va.us/forms/strmcons.html. The fee for obtaining the permit is \$240.00. Once the DEQ receives the completed application, approval can be expected in approximately one week. Contractors applying for this permit are encouraged to submit their Sedimentation and Erosion Control Plan (SECP) for approval prior to making application, as the permit application addresses the plan and whether approval for the SECP has been received. Once the permit is received, a copy should be forwarded to the Directorate of Public Works, Environmental and Natural Resources Division (Attention: Storm water Program).

At the completion of the permitted construction project, the contractor shall apply to the DEQ for "Notice of Termination." This shall be accomplished when the site has reached final stabilization and all storm water discharges from the construction activity that are authorized by the permit are eliminated or where the operator of the construction site has changed. Notice of Termination must be submitted within 30 days after final stabilization has been achieved or when the contractor is no longer the operator. A copy of the Notice to Terminate shall be submitted to the Directorate of Public Works, Environmental and Natural Resources Division (Attention: Storm Water Program).

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GLOSSARY

SECTION I

ABBREVIATIONS AND ACRONYMS

AATD Aviation Applied Technology Directorate

ACM Asbestos Containing Material

AEC Activity Environmental Coordinator or Alternate
AEM Advanced Environmental Management Training

AIN Ammunition Information Notice

AMO Authorized Military Official AP Affirmative Procurement AR Army Regulation

ARAR Applicable and Relevant or Appropriate Requirement

ARC Activity Recycling Coordinator
ASD Accumulation Start Date
ASP Ammunition Supply Point
AST Aboveground Storage Tank
ASU Ammunition Storage Unit
AUL Authorized Use List

BEM Basic Environmental Management Training

BOSS Base Operating Supply System
CAS Chemical Abstracts Service
CE Conditional Exemption

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CCL Container Contents Log
CFR Code of Federal Regulations
CHN Community Health Nurse
CLIN Contract Line Item Number

CP Contingency Plan
CTL Container Turn-in Log
CWA Clean Water Act
CX Categorical Exclusion
DA Department of Army
DAC Disposal Authority Code

DDA Designated Disposition Authority

DDESB Department of Defense Explosive Safety Board

DEH Directorate of Engineering and Housing---changed to DPW
DENIX Defense Environmental Network & Information eXchange

DEQ Department of Environmental Quality

DLA Defense Logistics Agency

DMWR Depot Maintenance Work Request

DOD Department of Defense

DO Delivery Order

DODAAC Department of Defense Activity Address Code

DOT Department of Transportation
DOL Directorate of Logistics

DPC Directorate of Peninsula Contracting

DPTMSEC Directorate of Plans, Training, Mobilization & Security

DPW Directorate of Public Works

DRM Directorate of Resource Management
DRMO Defense Reutilization and Marketing Office

DTID Disposal Turn-in Document - DD Form 1348-1A

EA Environmental Assessment
EBS Environmental Baseline Study

ECC Environmental Command Council EHS Extremely Hazardous Substance

EIF EPCRA Inventory Form Data Entry System

EIS Environmental Impact Statement
EM Environmental Management

EM HB Environmental Management Handbook
EMS Environmental Management System
EMT Environmental Management Team

ENRD Environmental and Natural Resources Division

EO Executive Order

EOD Explosives Ordnance Disposal

EOD TEU TWO Explosive Ordnance Disposal Training & Evaluation Unit Two EPCRA Emergency Planning and Community Right to Know Act

EPA Environmental Protection Agency
EPA ID EPA Identification Number
EPP Environmentally Preferable Product
ESD Engineering Services Division
ESD Environmental Screening Document

FE Fort Eustis

FFCA Federal Facilities Compliance Act
FONSI Finding of No Significant Impact

FR Federal Register
FS Fort Story

FUDS Formerly Used Defense Site
GSA General Services Administration

GOCO Government Owned, Contractor Operated Activity

Hazard Communication Standard

HazMart Centralized Facility for Requisitioning Hazardous Materials

HazMat Hazardous Materials

HAZMIN Hazardous Waste Minimization

HazWOPER Hazardous Waste Operations and Emergency Response

HC Hazardous Chemicals

HCEPHouse Chemical Exchange ProgramHEMTTHeavy Expanded Mobility Tactical Truck

HEPA High Efficiency Particulate Air
HIN Hazardous Item Number
HM Hazardous Materials

HMH Hazardous Material Handler or user

HMWCP Hazardous Materials & Waste Contingency Plan

HMIS Hazardous Material Information System **HRSD Hampton Roads Sanitation District**

HS Hazardous Substance

HTIS Hazardous Technical Information Services

HW Hazardous Waste

HWAFHazardous Waste Accumulation FacilityHWCHazardous Waste Coordinator or AlternateHWCPHazardous Waste Contingency Plan

HWHHazardous Waste HandlerHWMHazardous Waste ManagementHWSHazardous Waste SupervisorHWMPHazardous Waste Management Plan

IAW In Accordance With

ICP Integrated Contingency Plan

IEC Installation Emergency Coordinator
IED Improvised Explosive Device

IEM Intermediate Environmental Management Training

IH Industrial Hygiene LBP Lead-Based Paint

LBPMC Lead-Based Paint Management Coordinator

LDR Land Disposal Restrictions

LEPC Local Emergency Planning Committee

LOI Letter of Instruction
LQG Large Quantity Generator

MACAC Mid-Atlantic Coastal Area Committee

MEDDAC Medical Department Activity
MOU Memorandum of Understanding

MR Munitions Rule

MRIC Munitions Rule Implementation Council
MRIP Munitions Rule Implementation Policy

MSDS Material Safety Data Sheet NAB Naval Amphibious Base

NAR Notice of Ammunition Reclassification
NEPA National Environmental Policy Act
NFPA National Fire Protection Association

NHW Non Hazardous Waste

NIOSH National Institute for Safety and Health

NOI Notice of Intent
NOV Notice of Violation

NPDES National Pollutant Discharge Elimination System

NRC National Response Center NRW Non Regulated Waste NSN National Stock Number

OB/OD Open Burning/Open Detonation
ODC Ozone Depleting Chemical
ODS Ozone Depleting Substance

OPA Oil Pollution Act

OSHA Occupational Safety and Health Administration

PAO Public Affairs Office

Para Paragraph

PBT Persistent, Bioaccumu lative and Toxic

PCB Polychlorinated Biphenyls
PEL Permissible Exposure Limit

POC Point of Contact
POI Program of Instruction
POV Personally Owned Vehicle
P2 Pollution Prevention

PPA Pollution Prevention Act of 1990
PPC Pollution Prevention Coordinator
PPE Personal Protective Equipment

PPOA Pollution Prevention Opportunity Assessment

PROFS Professional Office System

PWC Public Works Center (Navy, on Fort Story)
RCRA Resource Conservation and Recovery Act

RC Recycling Coordinator

REC Record of Environmental Consideration

RDT&E Research, Development, Testing, and Evaluation

ROD Record of Decision

RONA Record of Non-Applicability
RMP Risk Management Program
RMP Risk Management Plan

Resource Recovery and Recycling

SARA Superfund Amendments and Reauthorization Act

SAS Satellite Accumulation Site

SCBA Self-Contained Breathing Apparatus
SERC State Emergency Response Commission

SOP Standing Operating Procedures

SPCC Spill Prevention, Control & Countermeasures Plan

SW Solid Waste

SWCC Solid Waste Collection Center

SSW Special Solid Wastes
TB Technical Bulletin

TCFE Transportation Center, Fort Eustis
TCLP Toxic Characteristic Leaching Procedure

TEU Technical Escort Unit
TM Technical Manual
TO Technical Order

TPQ Threshold Planning Quantity
TRI Toxic Chemical Release Inventory
TSCA Toxic Substances Control Act

TSDF Treatment, Storage, and Disposal Facility
TSDR Treatment, storage, disposal, or recycling

TSP Tri-Sodium Phosphate

TSS Less than 90 - Day Temporary Storage Site

USATC U. S. Army Transportation Center

USATCFE U. S. Transportation Center at Fort Eustis

USC United States Code

UST Underground Storage Tank

UW Universal Waste
UXO Unexploded Ordnance

VDEQ Virginia Department of Environmental Quality

VDH Virginia Department of Health

VHWMR Virginia Hazardous Waste Management Regulations

WDL Waste Description Log
WMM Waste Military Munitions
WSA Waste Stream Analysis
XRF X-Ray Fluorescence

SECTION II

SPECIAL TERMS and DEFINITIONS

Accumulation: A site that does not hold RCRA Interim Status or a RCRA permit (i.e., a site that does not have active RCRA Part A or Part B permit applications) may accumulate hazardous waste for a short period of time before shipping it off site. The waste must be accumulated in either tanks or containers; it may not be accumulated in surface impoundments. Generators of more than 1,000 kg (2,200 lbs) of hazardous waste per month may accumulate their waste for up to 90 days before shipping it off site.

Accumulation Start Date (ASD): The ASD is a key compliance date for Hazardous Waste Management (HWM) and Universal Waste Management (UWM). The ASD sets in motion when other actions must occur. The ASD must be assigned to a container of Hazardous Waste when HWs are first added to the container at a TSS or when the quantity limitation is reached at a SAS. The ASD must be assigned to a container of Universal Waste when UWs are first added to the container or the container is issued by the HWAF. Once the ASD is placed on a container, it cannot be changed. The "shell game" of moving a container from one accumulation area to another or recontainerizing the hazardous or universal waste does not restart the ASD. Do not falsify the ASD.

Active Munitions Inventory: The supply of chemical and conventional military munitions that are available for issue and use for combat, training, demonstrations, or research, development, testing, or evaluation.

Active Range: A military range that is currently in operation, construction, maintenance, renovation, or reconfiguration to meet current DOD component training requirements and is being regularly used for range activities.

Activity: An activity is a command, subcommand, off-site reserve command, directorate, tenant, contractor, subcontractor, Corps of Engineers (COE) Office, Defense Reutilization and Marketing Office (DRMO), or an organization located or conducting operations at Fort Eustis or Fort Story.

Activity Environmental Coordinator (AEC): The AEC is the single point of contact for all activity environmental matters and is the Activity Recycling Coordinator. AECs must be in the grade of Warrant Officer (WO1) or above for military units, GS-11 or above for government civilians or equivalent, and appropriate management level for contractor personnel.

Acutely Hazardous Waste: Any hazardous waste with an EPA Hazardous Waste Code beginning with the letter "P", or any of the following "F" codes: F020, F021, F022, F023, F026, and F027. These wastes are subject to stringent quantity standards for accumulation and generation.

Ammunition and Explosives Storage Facility: Any facility used for the storage of military munitions. This definition includes, but is not limited to: earth-covered magazines, above ground magazines, and open-air storage areas.

Ammunition Storage Unit (ASU): See Ammunition and Explosives Storage Facility.

Ammunition Supply Point (ASP): An area designated to receive, store, issue, and manage military munitions.

Amnesty Program: A Service based program intended to ensure the maximum recovery of standard military ammunition and explosives (A&E) outside the normal supply system. It is not intended to circumvent normal supply issue and turn-in procedures. It is established and implemented so that an individual is not intimidated or prevented from freely turning in A&E that has gotten outside the system.

Aqueous: Term usually meaning water based or water solution.

Activity Recycling Coordinator (ARC): The ARC is the generating activity's point of contact for recycling IAW TCFE Pam 200-1, Integrated Solid Waste Management.

Asbestos-containing Material (ACM): Any material or product, which contains more than 1 percent by weight asbestos.

Ash: The fly ash or bottom ash residual waste material produced from incineration or burning of solid waste or from any fuel combustion.

Authorized Military Official (AMO): A DOD representative with the express written authority to designate an entire class or type of munitions as a waste at one time.

Authorized State: A State, which has obtained authorization from EPA to direct the RCRA program.

Authorized Use List: List of hazardous materials, which an activity is authorized to requisition from the HazMart.

Beneficial Use: A use, which is of benefit as a substitute for natural or commercial products and does not contribute to adverse effects on health or environment.

Biomass: Biomass materials such as leaves, animal feces, limbs (under 3 feet in length and? inch in diameter), and items that decay rapidly.

Certification: Statement of professional opinion based on knowledge and belief.

Characteristic Waste: A waste classified as hazardous because it is ignitable, corrosive, reactive, or toxic as determined by the toxicity characteristic leaching procedure. It has an EPA Hazardous Waste Code in the range D001 to D043.

Chemical Munitions and Agents: A munition that through its chemical properties, produces lethal or other damaging effects on human beings, except that such term does not include riot control agents, chemical herbicides, smoke and other obscuration materials.

Civil Authorities: Civilian law enforcement units at the local, State, or Federal level.

Civilian Munitions Personnel: Civilian employees of the DoD, a DoD Component, or a private entity under contract to DoD or a DoD Component, who have received formal training in the identification, handling, removal, and treatment of pyrotechnics, explosives, and propellant PEP materials.

Clean wood: Uncontaminated natural or untreated wood. It does not include wood that has been treated, adulterated, or chemically changed in some way; treated with glues, binders, resins, or painted, stained, or coated.

Closed Range: A military range that has either taken out of service as a range or put to new uses that are incompatible with range activities or the military no longer considers the range to be a potential range area. A closed range is still under the control of a DOD component.

Code of Federal Regulations (CFR): The detailed regulations, written by Federal agencies, to implement the provisions of laws passed by Congress. Regulations in the CFR have the force of Federal law.

Commercial Waste: All solid waste generated by establishments engaged in business operations other than manufacturing or construction.

Compost: A stabilized organic product by a controlled aerobic decomposition process in such a manner that the product can be handled, stored, and or applied to the land without adversely affecting public health or the environment.

Compound: A substance composed of atoms or ions of two or more elements in chemical combination.

Conditional Exemption: An exemption from the regulatory definition of hazardous waste; therefore, from compliance with specific environmental requirements pertaining to the storage and transport of hazardous waste. This exemption is conditional in that compliance with certain criteria and requirements.

Construction Waste: A solid waste, which is produced or generated from construction, remodeling, or repair of pavements, houses, commercial building, and other structures.

Container: Any portable device, in which a material is stored, transported, treated, disposed of, or otherwise handled and includes transport vehicles that are containers themselves (e.g., tank-trucks, tanker-trailers, and rail cars), and containers placed on or in a transport vehicle.

Contaminant: Any unwanted physical, chemical, biological, or radiological substance or matter that has an adverse effect on air, water, or soil.

Contingency Plan: A document setting out an organized planned and coordinated course of action to be followed in the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health or the environment.

Corrosivity:

- a. A solid waste exhibits the characteristic of Corrosivity if a representative sample of the waste has either of the following properties:
- (1) It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.4, as determined by a pH meter using either the test method specified in the "Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods."
- (2) It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55 C (130 F as determined by the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods"
- b. A solid waste that exhibits the characteristics of Corrosivity and has the EPA Hazardous Waste Number of D002.

Deflagration: As relating to open burn, delegation is a rapid chemical reaction in which the output of heat is enough to enable the reaction to proceed and be accelerated without input of heat from another source. Deflagration is a surface phenomenon with the reaction products flowing away the un-reacted material along the surface at subsonic velocity. The effect of a true deflagration under confinement is an explosion. Confinement of the reaction increases pressure, rate of reaction and temperature, and may cause transition into a detonation.

Demilitarization: The act of: (1) Disassembling chemical or conventional military munitions for the purpose of recycling, reclamation, or reuse of components; or (2) Rendering chemical or conventional military munition innocuous or ineffectual for military use (i.e., removing the military offensive or defensive characteristics), which may include the disposal of unusable components of the munition. The term encompasses various approved demilitarization methods such as mutilation, alteration, or destruction to prevent further use for its originally intended military purpose.

Department of Defense Explosives Safety Board (DDESB): A Joint Service board composed of a chair, voting representatives from the Services, and a permanent military and civilian Secretariat, to perform Board operational and administrative functions. The DDESB provides impartial and objective advice to the Secretary of Defense and DoD Components on explosive safety matters.

Designated Disposition Authority (DDA): The only personnel in the DOD authorized to declare unused military munitions as WMM except in the case of explosives or munitions emergency, abandoned munitions, or a declaration by the Authorized Military Official (AMO). Each Service has at least one DDA and may elect to have more (e.g., a DDA for a particular program or command). The single manager for conventional ammunition (SMCA) is the single DDA at the DOD level. DDAs are responsible for evaluating munitions that are excess to current requirements or otherwise no longer part of the active inventory for safety, other uses, R3 possibilities, and treatment.

Destruction: The act of detonating non-waste used or unused munitions by means other than the originally designed weapon delivery system. Destruction includes those activities by EOD technicians when conducting range clearance operations, training, responding to EOD emergencies or destruction of off-range UXO. However, it does not include demilitarization methods of open burning or open detonation (OBOD), which are considered a means of treatment for WMM.

Detonation: As relating to open detonation, detonation is a violent chemical reaction within a chemical compound or mechanical mixture evolving heating and pressure. A detonation, which proceeds through the reacted material toward the un-reacted at a supersonic velocity. The result of the chemical reaction is exertion of extremely high pressure in the surrounding medium forming a propagating shock wave that originally is of supersonic velocity.

Dike: An embankment or ridge of either natural or man-made materials used to contain liquids, sludges, solids, or other materials.

Discarded Material: A material, which is:

- a. Abandoned by being:
 - (1) Disposed.
 - (2) Burned or incinerated.
- (3) Accumulated, stored or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned or incinerated.
 - b. Recycled.
 - c. Considered inherently waste-like.

Discharge: The accidental or intentional spilling, leaking, pumping, pouring, emitting, emptying, or dumping of any quantity of hazardous materials, hazardous wastes, or non-hazardous wastes, petroleum product or non-petroleum oil into or on any drains, land, or waters. Discharge is synonymous with the terms "spill" and "release". Discharges may involve materials or wastes in liquid, solid or gaseous form.

Disposal: The discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

Disposal Facility: A facility or part of a facility at which hazardous waste is intentionally placed into or on any land or water, and at which the waste will remain after closure.

Drip Pad: An engineered structure consisting of a curbed, free-draining base, constructed of non-earthen materials and designed to convey preservative kickback or drippage from treated wood, precipitation, and surface water run-on to an associated collection system at wood preserving plants.

Emergency and Hazardous Chemical Inventory: An annual report submitted to the SERC, respective LEPC, and local fire departments. It provides information about those hazardous materials and extremely hazardous substances stored at the installation above threshold planning quantities. Also referred to as the Tier 2 or Tier II report. *Empty Containers (DOT or OSHA Empty):*

- a. Containers are not empty until they are sufficiently cleaned of residues and purged of vapors to remove any potential hazards.
 - b. Labels have to remain on containers until empty.
 - c. Labels must be removed, defaced, or painted over once the container is empty.
 - d. Containers may be reused for other purposes when empty.

Empty Containers (RCRA Empty):

- a. A container or an inner liner removed from a container that has held any hazardous waste, except a waste that is a compressed gas or that is identified as an acutely hazardous waste is empty if:
- (1) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, aspirating, scraping, and
 - (a) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the containers or inner liner;

or

(b) No more than 3% by weight of the total capacity of the container remains in the container or the inner liner if the container is less than or equal to 110 gallons in size,

or

- (c) No more than 0.3% by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 110 gallons in size.
- b. Wastes removed IAW (a) above are usually from closed-top, closed-head, or non-removable top containers. Wastes removed from open top or removable tops should have less than the quantities listed in (a) above, e.g., paint residue bonded to the container, which cannot be removed by normal scraping.
- c. A container, which has held a compressed gas, is empty when the pressure in the container is at atmospheric pressure and valve stem has been removed or holes have been made in the container to prevent reuse. This includes aerosol cans.
 - d. A container or an inner liner removed from a container that once held an acutely hazardous waste is empty if:
- (1) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate; or
- (2) The container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or

- (3) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container has been removed.
- e. Labels have to remain on containers until they are sufficiently cleaned of residues and purged of vapors to remove any potential hazards.

Environmental Assessment: Aconcise analytical document prepared when it is uncertain as to whether a federal action will have significant impact on the environment.

Environmental Impact Statement: A detailed, comprehensive analytical document prepared when a federal action will significantly affect the environment.

EPA Identification Number (EPA ID): The number assigned by EPA to each hazardous waste generator, hazardous waste transporter, or hazardous waste facility.

EPA Hazardous Waste Number or Code: The number assigned by the EPA to each hazardous waste.

Delete – no longer used: EPCRA Inventory Form Data Entry System (EIF): The EIF is the automated data entry system created by ENRD and distributed to installation activities. All installation activities use this system to provide hazardous material inventories to ENRD. EIF consists of a data disk, applicable MSDS and a signed certification form.

EPCRA Reports: This is an informal general term that refers Hazardous Materials Inventory and Munitions Expenditure Reports.

Explosive Ordnance Disposal: The detection, identification, field evaluation, rendering safe, recovery, and final destruction of UXO or unused munitions as a hazardous material. It may also include the rendering safe or treatment of used or unused munitions.

Explosives or Munitions Emergency: A situation involving the suspected or detected presence of UXO, damaged or deteriorated explosives or munitions, an improvised explosive device (IED), other potentially explosive material or device, or other potentially harmful military chemical munitions or device, that creates an actual or potential imminent threat to human health, including safety, or the environment, including property, as determined by an explosives or munitions emergency response specialist.

Explosives or Munitions Emergency Response: An immediate response by explosives and munitions emergency response personnel to control, mitigate, or eliminate the actual or potential threat encountered during an explosives or munitions emergency. An explosives or munitions emergency response may include in-place render-safe procedures, treatment or destruction of the explosives or munitions or their transport to another location to be rendered safe, treated, or destroyed. Reasonable delay in the completion of an explosives or munitions emergency response, which a necessary, unforeseen or uncontrollable circumstances cause; do not terminate the explosives or munitions emergency. Explosives and munitions emergency responses can occur on either public or private lands and are not limited to responses at RCRA facilities.

Explosives or Munitions Emergency Responders: Individuals trained in conventional or chemical munitions or explosives handling, transportation, render-safe procedures, or destruction techniques. Explosives or munitions emergency response specialists include DoD emergency explosive ordnance disposal (EOD) technicians, technical escort unit (TEU) personnel, DoD-certified civilian or contractor personnel; and other Federal, State, or local government, or civilian personnel similarly trained in explosives or munitions emergency responses.

Extremely Hazardous Substances (EHS): An EHS is any substance listed in 40 CFR Part 355 Appendix A and Appendix B (also referred to as Section 302 of EPCRA). These appendices encompass a special list of hazardous

chemicals. This list was established by the EPA to identify hazardous materials that could inflict serious, irreversible harm from accidental releases. Special reporting procedures must be executed in the event of a release.

Facility: A site, which manages hazardous waste at the site location (usually fence line to fence line). Facilities are also called generators, "TSDFs" or "TSDRs"

Flash Point: The minimum temperature at which a liquid or solid gives off sufficient vapor to form an ignitable vapor-air mixture near the surface of the liquid or solid. An ignitable mixture is one that, when ignited, is capable of the initiation and propagation of flame away from the source of ignition. Propagation of flame means the spread of the flame from layer to layer independent of the source of ignition.

Form R Report: The Form R report (also referred to as the Toxic Chemical Release Inventory) is an annual report submitted to the EPA. It provides information concerning types and quantities of certain chemicals that are released into the environment, transferred off site as hazardous waste, and that, which is recycled. The requirements for this report are outlined in Section 313 of EPCRA. The Form R is prepared by ENRD based on hazardous material inventory information provided by installation activities.

Free Liquids: Liquids, which readily separate from the solid portion of a waste under ambient temperature and pressure.

Friable Asbestos: Any material containing more than 1 percent asbestos by weight, which when dry, may be crumbled, pulverized, or reduced to powder by hand pressure.

Fugitive Emission: Any emission not controlled by a pollution control device.

Garbage: Readily putrescible discarded materials composed of animal, vegetable or other organic matter.

Generating Activity: Each Activity that manages hazardous chemicals, hazardous materials, hazardous substances, solid wastes, universal wastes, non-hazardous wastes, and hazardous wastes.

Generator: Any facility, by site location, which manages hazardous chemicals, hazardous materials, hazardous substances, solid wastes, non-hazardous wastes, and hazardous wastes.

Halogen: One of the following elements; fluorine (F), chlorine (Cal), bromine (Br), iodine (I), and astatine (At).

Halogenated: A compound that contains one or more of the following elements; fluorine (F), chlorine (Cl), bromine (Br), iodine (I), and astatine (At). Usually refers to a carbon compound.

Hazard Communication Standard: Safety standard defined by OSHA, 29 CFR 1910.1200.

Hazardous Chemicals (HCs): U. S. Occupational Safety and Health Administration (OSHA) term for any element, chemical compound, or mixture of elements and compounds that is a physical or health hazard. MSDSs (Material Safety Data Sheets) are required for these materials.

Hazardous Materials (HMs) or HazMat: U. S. Department of Transportation (DOT) term for a substance or material which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated. For DOT transportation purposes, this term includes hazardous substances and hazardous wastes in addition to serviceable materials. Unless otherwise stated in this SOP the terms "Hazardous Materials" or "HazMat" will be used to mean serviceable hazardous materials (HMs) or hazardous chemicals (HCs) only.

Hazardous Substances (HSs): The U. S. Environmental Protection Agency (EPA) term for substances identified by the Comprehensive Environmental Response, Compensation, and Liability (CERCLA) Act, Superfund Amendments and Reauthorization Act (SARA), Clean Water Act, Clean Air Act, Toxic Substances Control Act, and hazardous

wastes which pose a potential hazard to human health or the environment.

Hazardous Waste (HW): EPA term for a solid waste that poses a potential hazard to human health or the environment when not properly managed due to its ignitable, corrosive, reactive, or toxic properties. Examples: oil based paints, highly flammable solvents, strong acids or bases, etc.

Hazardous Waste Activity: The handling of hazardous waste as in the generation, transportation, treatment, storage, or disposal of any hazardous waste.

Hazardous Waste Discharge: The accidental or intentional spilling, leaking, pumping, pouring, emitting, emptying, or dumping of hazardous waste into or on any land or state waters.

Hazardous Waste Constituent: A constituent, which caused the EPA to list the hazardous waste.

Hazardous Waste Coordinator (HWC): HWCs manage the activity's hazardous waste accumulation sites: Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs). HWCs are the Recycling Coordinators at this level. A HWC must be in the grade of E-5 or above for military units, GS-5, WG-6 or above for government civilians or equivalent, and appropriate supervisory level for contractor personnel.

Hazardous Waste Generation: The act or process of producing a hazardous waste.

Hazardous Waste Handler (HWH): An individual having assigned duties that involve handling hazardous wastes.

Hazardous Waste Management (HWM): The systematic control of the generation, collection, source separation, storage, transportation, processing, treatment, recovery, and disposal of hazardous wastes.

Hazardous Waste Minimization: See Waste Minimization.

Hazardous Waste Supervisor (HWS): A first line supervisor of Hazardous Waste Handlers (HWHs).

Household Hazardous Waste: Any household waste, which meets the definition of a hazardous waste.

Household Waste: Any waste material, including garbage, trash, refuse, derived from households including, single and multifamily residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day use recreational areas, excluding sanitary waste in septic tanks.

Ignitability:

- a. A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:
- (1) It is a liquid, other than an aqueous solution containing less than 24% alcohol by volume, and has a flashpoint of less than 60 C (140 F), as determined by a Pensky-Martens Closed Cup Tester, or a Setaflash Closed Cup Tester.
- (2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.
- (3) It is a flammable compressed gas as defined by DOT and as determined by the test methods approved by the EPA Administrator.
 - (4) It is an oxidizer as defined by DOT.

b. A solid waste that exhibits the characteristics of ignitability has the EPA Hazardous Waste Number of D001.

Improvised Explosive Devices (IEDs): Devices fabricated in an improvised manner that are designed to destroy, disfigure, distract, or harass and that consist of explosive, destructive, lethal, noxious, pyrotechnic, or incendiary chemicals. These non-standard devices may be made from military or non-military materials.

Inactive Range: A military range that is not currently being used, but that is still under military control, and which the military both considers to be a potential range area and has not put to a new use that is incompatible with range activities. A potential range area is defined as meeting one of three criteria: These are: (1) (Mobilization and Force Projection) Ranges that are held by a DoD component for the purpose of preparing individuals and units for worldwide deployment, redeployments, or demobilization in response to war, stability, and support operations or projected training requirements that would exceed current active range capabilities; (2) (Force Structure) Ranges held as inactive during realignment, reorganization, stationing, or re-equipping of units projected to use these ranges under new training requirements; or (3) (Future) Ranges that are held by DoD Components for future use in support of the National Security Policy or DOD Component doctrine that ensures the capability to produce, establish, and maintain conditions needed for operational success.

Incompatible Waste: A waste, which is unsuitable for:

a. Placement in a particular device or facility because it may cause corrosion or decay of containment materials;

or

b. Commingling with another waste or material under uncontrolled conditions and because the commingling might produce heat or pressure, fire, or explosion, violent reaction, toxic dusts, mists, fumes, or flammable fumes or gases.

Industrial Waste: Any solid waste generated by manufacturing or industrial processes that is not regulated as hazardous wastes.

Inorganic: All substances except hydrocarbons and their derivatives, or all substances not considered to be compounds of carbon.

Institutional Waste: Any solid waste emanating from institutions such as but not limited to hospitals, nursing homes, orphanages, or schools.

Integrated Contingency Plan: The US Army Transportation Center plan describing hazardous substance and petroleum discharge prevention and response actions. It includes regulatory requirements associated with the Hazardous Waste Contingency Plan, Facility Response Plan, and Spill Prevention Control & Countermeasures Plans.

Land Disposal Restrictions (LDR): Restrictions that require treatment of wastes or wastes meeting certain specifications before land disposal.

Land Disposal: Placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or concrete vault or bunker intended for disposal purposes.

Large Quantity Generator (LOG): A site is a LOG if it meets any of the following criteria:

a. The site generated in one or more months during the year $1,000 \, \mathrm{kg}$ ($2,200 \, \mathrm{lbs}$) or more of RCRA hazardous waste:

or

b. The site generated in one or more months during the year, or accumulated at any time, 1 kg (2.2 lbs) of RCRA acutely hazardous waste;

or

c. The site generated or accumulated at any time more than 100 kg (220 lbs) of spill cleanup material contaminated with RCRA acute hazardous waste.

Leachate: Liquid, including any suspended components in the liquid that has percolated through or drained from hazardous waste.

Litter: Any solid waste that is discarded or scattered outside the immediate area.

Local Emergency Planning Committee (LEPC): LEPCs comprise representatives from local government, emergency planners & responders, private industry, federal facilities, military installations and citizens of a given local area. LEPCs are recipients of the Emergency & Hazardous Chemical Inventory (also known as the Tier 2 or Tier II report), disseminate information from the Emergency & Hazardous Chemical Inventory reports to public requests for such information and develop contingency plans for responding to hazardous substance discharges. The U.S. Army Transportation Center is a member of and submits Tier 2 reports to two LEPCs (reports are also submitted to the SERC and local fire departments). Fort Eustis submits Tier 2 reports to the Peninsula Local Emergency Planning Committee. The Fort Story Tier 2 report is submitted to the Virginia Beach Local Emergency Planning Committee.

Listed Wastes: These wastes are listed as hazardous under RCRA because they have at least one of the following properties; ignitability, Corrosivity, reactivity, toxicity, or acutely hazardous. Container residues or spill residues from listed wastes will also be listed. They bear EPA Hazardous Waste Codes beginning with the letters F, P, U, or K:

- "P" Listed (Acutely HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the "P" list. Waste codes start with "P" e.g. P001.
- "U" Listed (Toxic HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the "U" list. Waste codes start with "U" e.g. U001.
 - "F" Listed: Mostly spent solvents from non-specific sources. Waste codes start with "F" e.g. F001.
 - "K" Listed: Mostly wastes from specific manufacturing sources. Waste codes start with "K" e.g. K001.

Management: Management of hazardous chemicals, hazardous materials, hazardous substances, solid wastes, non-hazardous wastes, universal wastes, and hazardous wastes includes but is not limited to the following functions: budgeting, funding, acquisition, safety, transportation, identification, classification, packaging, labeling, marking, record keeping, handling, storage, use, disposal, reporting, inspecting, and personnel training.

Manifest: The shipping document originated and signed by the generator, which contains the information specified in RCRA and VHWMR. See Uniform Hazardous Waste Manifest.

Manifest Document Number: The serial number assigned to the manifest or delivery document for record keeping and reporting purposes.

Material Profile: is a serialized document used to identify waste streams having hazardous properties, various EPA codes, and DOT shipping information.

Material Safety Data Sheet (MSDS): A document prepared by the importer or manufacturer listing a product's

hazardous chemicals, physical properties, chemical properties, health effects, and appropriate safety precautions for utilizing the product.

Military Magazine: See Ammunition and Explosive Storage Facility.

Military Munitions: All ammunition products and components produced or used by or for the US Department of Defense or the US Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the US Coast Guard, the US Department of Energy, and National Guard personnel. Includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD Components, including bulk explosives and chemical warfare agents, chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof. Does not include: wholly inert items, improvised explosive devices, and nuclear weapons, devices, and components thereof. (However, it does include non-nuclear components of nuclear devices, managed under DOE's nuclear weapons program after all required sanitization operations under the Atomic Energy Act of 1954, as amended, have been completed.

Military Range: A designated land or water area set aside, managed, and used to conduct research on, develop, test and evaluate military munitions and explosives, other ordnance, or weapon systems, or to train military personnel in their use and handling. Ranges include firing lines and positions, maneuver areas, test pads, detonation pads, impact areas, and buffer zones with restricted access and exclusionary areas. This definition does not include airspace, or water, or land areas underlying airspace used for training, testing, or research and development where military munitions have not been used.

National Pollutant Discharge Elimination System (NPDES): A provision of the Clean Water Act which prohibits discharge of pollutants into waters of the United States unless a special permit is issued by EPA, a State, or where delegated, a tribal government on an Indian Reservation.

Non-halogenated: A compound that **does not** contain one or more of the following elements; fluorine (F), chlorine (Cl), bromine (Br), iodine (I), and astatine (At). Usually refers to a carbon compound.

Non-Hazardous Waste (NHW): A term for a special solid waste not meeting the definition of a hazardous waste and originating from hazardous chemicals or hazardous materials. Examples: oily rags, oil and grease contaminated dry sweep, latex paints, etc.

Non-regulated Waste: An often-confusing term that usually means the waste is not regulated as a hazardous waste.

Nuisance: An activity which unreasonably interferes with an individual's or the public's comfort, convenience or enjoyment such that it interferes with the rights of others by causing damage, annoyance, or inconvenience.

Off-site: Any site that does not meet the definition of on-site.

Oil: A general term for petroleum and non-petroleum oils. Petroleum oils include fuels, lubricants, hydraulic fluid, motor oil, and lubricating oil. Non-petroleum oils include mineral oil, animal fat, and vegetable oils. All oils are considered hazardous materials.

On-site: The same or geographically contiguous property, which may be divided by public or private right-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along the right-of-way. Non-contiguous properties owned by the same person, but connected by a right-of-way, which he controls, and to which the public does not have access is also considered on-site property.

Open Burn (OB): Open burning means the combustion of any material without; control of combustion air to maintain adequate temperature for efficient combustion; containment of the combustion-reaction in an enclosed device to

provide sufficient residence time and mixing for complete combustion, and control of emission of the gaseous combustion products. Most OB sites are permitted as miscellaneous units as part of the EPA permitting process for Treatment, Storage, and Disposal Facilities. See Deflagration.

Open Detonation (OD): A chemical process used for the treatment of unserviceable, obsolete, and or waste munitions whereby an explosive donor charge initiates the munitions to be detonated. Although surface detonations can be performed under certain circumstances, most munitions are treated in four to six-foot-deep pits for safety purposes. Most OD sites are permitted as miscellaneous units as part of the EPA permitting process for Treatment, Storage, and Disposal Facilities. See Detonation.

Open Dump: A site on which any solid waste or hazardous waste is placed, discharged, deposited, injected, dumped, or spilled so as to create a nuisance or so as to pose a substantial present or potential hazard to human health or the environment, including the pollution of air, land, surface water or ground water.

Organic Compounds: All compounds of carbon (C) except binary compounds as the carbon oxides, carbides, carbon disulfide, etc. and tertiary compounds as metallic cyanides, phosgene, carbonyl sulfide, etc.

Package or Outside Package: A packaging plus its contents.

Packaging: The assembly of one or more containers and any other components necessary to assure compliance with minimum packaging requirements under DOT and includes containers (other than freight containers or over packs), portable tanks, cargo tanks, tank cars, and multi-unit tank car units.

Person: An individual, trust, firm, joint stock company, corporation (including a government corporation), partnership, association, state, municipality, commission, political subdivision of a state, any interstate body, or federal government agency.

pH: A scale used to measure the relative strength of an acid or base. A pH of 1 is a strong acid and a pH of 14 is a strong base.

Pile: Any non-containerized accumulation of solid, nonflowing hazardous waste that is used for treatment or storage.

Pollutant: Any substances, which causes or contributes to, or may cause or contribute to environmental degradation when discharged into the environment.

Pollution Prevention (P2): Generally, the use of processes, practices, or products that reduce or eliminate the generation of pollutants and wastes, including those processes, practices, and products which protect natural resources through conservation or more efficient utilization.

Putrescible Waste: Any solid waste, which contains organic material capable of being decomposed by microorganisms and cause odors.

Reactivity:

- a. A solid waste exhibits the characteristic of reactivity if a representative sample of the waste has any of the following properties:
 - (1) It is normally unstable and readily undergoes violent changes without detonating.
 - (2) It reacts violently with water.

- (3) It forms potentially explosive mixtures with water.
- (4) When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
- (5) It is a cyanide or sulfide bearing waste, which when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment:
- (6) It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement;
- (7) It is readily capable of detonation or explosive decomposition or reactions at standard temperature and pressure;
 - (8) It is a forbidden explosive as defined by DOT or as a Class A or Class B explosive as defined by DOT.
- b. A solid waste that exhibits the characteristic of reactivity and has the EPA Hazardous Waste Number of D003. *Reclaimed Material:* A material which is processed or reprocessed to recover a usable product or is regenerated to a usable form.

Reclamation: The processing or regeneration of a material to recover a usable product. Examples are recovery of lead from spent batteries, silver from photo processing, and regeneration of spent solvents.

Resource Recovery and Recycling (R3): A DoD initiative to demilitarize military munitions using methods other than open burning/open detonation. This initiative includes reuse, or sale "as is" (e.g., Foreign Military Sales), conversion to a commercial product for sale or industrial use, or disassembly or modification and partial or whole use for a military application.

Recycled Material: A material, which is used, reused or reclaimed.

Recycling: The use or reuse of waste as an effective substitute for a commercial product, or as an ingredient or feedstock in an industrial process. It also refers to the reclamation of useful constituent fractions within a waste material or removal of contaminants from a waste to allow it to be reused. Recycling implies use, reuse, or reclamation of a waste, either on site or off site, after it has been generated.

Recycling Coordinator (RC): The RC is the generating activity's point of contact for recycling.

Refuse: All solid waste having a character of solids rather than liquids and which are composed wholly or partially of materials such as garbage, trash, rubbish, litter, and residues from spill cleanups, or other discarded materials.

Regulated Activity or Activity Subject to Regulation: Any activity subject to regulation under the RCRA, SDWA, CAA, or regulations of the Commonwealth of Virginia.

Regulation: The control, direction and governance of solid and hazardous waste activities by means of the adoption and enforcement of laws, ordinances, rules and regulations.

Release: Synonymous with the terms "spill" and "discharge". Releases may involve materials or wastes in liquid, solid or gaseous form.

Representative Sample: A sample of a universe or whole, which can be expected to exhibit the average properties of the universe or whole.

Residual: The hazardous waste remaining after treating, disposing or recycling hazardous waste.

Resource Conservation: Reduction of the amounts of waste generated, reduction of overall resource consumption, or utilization of recovered resources.

RCRA Permit: A site which has submitted both a RCRA Part A permit application and a RCRA Part B permit application, and has had the Part B permit application approved.

Rubbish: Any combustible materials or slowly putrescible discarded materials which include but not limited to wood, painted matter, plastic and paper products, rags, and other combustible materials or slowly putrescible materials not include as garbage.

Responsible Individual: An individual authorized to sign official documents for and act on behalf of a company or organization.

Reuse: A material is "used or reused" if it is either:

a. Employed as an ingredient (including use as an intermediate) in an industrial process to make a product. However, a material will not satisfy this condition if distinct components of the material are recovered as separate end products;

or

b. Employed in a particular function or application as an effective substitute for a commercial product.

Satellite Accumulation Site (SAS): Accumulation site where the volume of hazardous wastes must not exceed 55 gallons of HW or 1 quart of acutely HW at or near point of generation, under the control of the operator generating the waste. HWs must be turned in within 3 days to a TSS or HWAF.

Scrap Metal: Bits and pieces of metal parts (e.g., bars, turnings, rods, sheets, wire) or metal pieces that may be combined together with bolts or soldering (e.g., radiators, scrap automobiles, railroad box cars), which when worn or superfluous can be recycled.

Secondary Container: A storage device into which a container can be placed for the purpose of containing any leakage of hazardous waste from such emplaced container.

Shipment: The movement or quantity conveyed by a transporter of a hazardous waste between a hazardous waste generator and a designated HWM facility of a subsequent transporter.

Site: Any holder of an EPA Identification Number. A site may be a "generator", a "facility" (or "TSDR facility"), or both, or a non-regulated facility which has conservatively requested and received an EPA ID number. The land or water area upon which a facility or activity is physically located or operated, including, but not limited to adjacent land used for utility systems such as repair, storage, shipping, or processing areas, or other areas incident to the controlled facility or activity.

Sludge: Any solid waste, semi-solid or liquid waste generated from municipal, commercial or industrial wastewater treatment plants.

Solid Waste (SW): EPA term for any discarded material including materials which are abandoned, recycled, reclaimed, or accumulated speculatively.

Solvent: A substance (usually liquid) capable of dissolving or dispersing one or more other substances. Solvents include, but are not limited to, the non-spent materials listed in EPA Hazardous Waste Codes F001 through F005.

Source Code: The production or service process associated with generation of waste.

Source Reduction: Any practice which reduces the amount of a hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal, and any practice which reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants.

Source Separation: Separation by the waste generator of materials that are collected for use, reuse, or reclamation.

Speculatively Accumulated Material: A material, which is accumulated before being recycled. A material is not accumulated speculatively; however, if the person accumulating it can demonstrate that the material is potentially recyclable and has a feasible means of being recycled; and that during the calendar year (commencing on January 1) the amount of material that is recycled, or transferred to a different site for recycling, equals at least 75% by weight or volume of the amount of that material accumulated at the beginning of the period. In calculating the percentage of

turnover, the 75% requirement is to be applied to each material of the same type (e.g., slags from a single smelting process) that is recycled in the same way (i.e., from which the same material is recovered or that is used in the same way).

Special Solid Waste (SSW): A term for solid wastes (excluding hazardous wastes) that are difficult to handle and/or require special precautions because of hazardous properties or the nature of the waste creates waste management problems in normal operations. These items cannot be discarded in dumpsters. SSWs include: Universal Wastes (UW), Non-Hazardous Wastes (NHW), asbestos, rubber tires, appliances, steel drums, compressed gas cylinders, aerosol cans, containers of liquids, filters, Used Oil, etc.

Spent Material: Any material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without processing.

Spill: Any accidental or intentional unpermitted spilling, leaking, pumping, pouring, emitting, emptying or dumping of hazardous materials, hazardous wastes, non-hazardous wastes, petroleum products or non-petroleum oil into or on any land, drains or water. The term "spill" is synonymous with the terms "discharge" and "release". Spills may involve materials or wastes in liquid, solid or gaseous form.

State Emergency Response Commission (SERC): SERCs are mandated by federal law. They receive Emergency & Hazardous Chemical Inventory (Tier 2) and Toxic Chemical Release Inventory reports and interface with local emergency planning committees. The Department of Environmental Quality serves as the SERC for the State of Virginia.

Storage: Temporary holding of waste pending treatment or disposal. Storage methods include containers, tanks, waste piles, and surface impoundments.

Storage of Hazardous Waste: Containment, either on a temporary basis or for a period of years, in such a manner as not to constitute disposal of such hazardous waste.

Superfund: The program operated under the legislative authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendment Reauthorization Act (SARA) that funds and

carries out the EPA solid waste emergency and long-term removal remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority level on the list, and conducting and/or supervising the ultimately determined cleanup and other remedial actions.

Surface Impoundment: Treatment, storage, or disposal of liquid hazardous waste in ponds.

Temporary Storage Site (TSS): Accumulation site, which may hold any volume of hazardous wastes from any source. Waste may only be accumulated for 14 days before turning-in to the HWAF.

Tier 2 Report: The Tier 2 report (also referred to as Emergency and Hazardous Chemical Inventory or Tier II) is an annual report submitted to the State of Virginia and applicable local emergency planning committees IAW EPCRA. It provides emergency planners and responders with information pertaining to the hazardous materials that exist at Fort Eustis and Fort Story. This report is prepared by ENRD based on hazardous material inventory information provided by installation activities.

Toxicity:

Training on HWM: Formal instruction, supplementing an employee's existing job knowledge, designed to protect human health and the environment via attendance and successful completion of a course of instruction in hazardous waste management procedures, including contingency plan implementation, relevant to those operations connected with the employee's position at the facility.

Transferred Range: A military range that is no longer under the control of a DOD Component and has been leased, transferred, or returned to another entity, to include federal entities, for use.

Transferring Range: A military range that is proposed to be leased or transferred from DOD to another entity or disposed of by conveying title to a non-federal entity. An active range will not be considered a "transferring range" until the transfer is imminent.

Transporter of Hazardous Wastes: A person engaged in the off-site transportation of hazardous waste by air, rail, road, or water.

Trash: Combustible and noncombustible discarded materials. Term is used interchangeably with the term rubbish.

Treatment: Any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to:

- a. Neutralize such wastes:
- b. Recover energy or material resources from the waste; or
- c. Render such waste non-hazardous or less hazardous; safer to transport, store, or dispose; or amenable to recovery, storage, or reduction in volume.

Treatment, Storage, and Disposal Facility (TSDF): Site where a hazardous substance is treated, stored, or disposed. TSD facilities are regulated by EPA and States under RCRA.

Triple Rinsed: Containers, which have been flushed three times, each time using a volume of diluents at least equal to 10% of the container's capacity. The diluents must be capable of dissolving the material being removed.

Unexploded Ordnance (UXO): Military munitions that have been primed, fused, armed, or otherwise prepared for action, and that has been fired, dropped, launched, projected, or placed in such a manner as to constitute a hazard to

operations, installation, personnel, or material and remains unexploded either by malfunction, design, or any other cause.

Uniform Hazardous Waste Manifest: The shipping document (EPA Form 8700-22 or 8700-22a) that pertains to hazardous waste and is duly signed by the generator.

Universal Waste (UWs): A limited number of wastes that would otherwise have to be managed as Hazardous Wastes (HWs), e.g., batteries, lamps, pesticides, and mercury containing thermostats.

Universal Waste Handler (UWH): An individual having assigned duties that involve handling universal wastes.

Universal Waste (UW) Lamps: includes but not limited to fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, metal halide bulbs and tubes, etc. This applies to used lamps when removed from the fixture and unused lamps when discarded.

Universal Waste (UW) Batteries: essentially includes all batteries excluding lead acid batteries already managed as recyclables and alkaline batteries.

Unused Military Munitions: Unused military munitions include those that have not been fired, dropped, launched, placed, or otherwise used (e.g., munitions in the active inventory available for issue and use in training or operations; munitions issued to a using unit, taken into the field by that unit, but which are not used and which the unit returns to the ASP for return to the inventory).

Used or Fired Military Munitions: Used or fired munitions are those military munitions that: (1) have been primed, fused, armed, or otherwise prepared for action, <u>and</u> have been fired, dropped, launched, projected, placed, or otherwise used; (2) munitions fragments, (e.g., shrapnel, casings, fins, and other components, to include arming wires and pins) that result from the use of military munitions; or (3) malfunctions or misfires (e.g., fail to properly fire or detonate).

Used or Reused Material: A material, which is either:

a. Employed as an ingredient (including use as an intermediate) in an industrial process to make a product (for example, distillation bottoms form one process used as feedstock in another process). However, a material will not satisfy this condition if distinct components of the material are recovered as separate end products (as when metals are recovered from metal containing secondary materials);

or

b. Employed in a particular function or application as an effective substitute for a commercial product (for example, spent pickle liquor used as phosphorus precipitant and sludge conditioner in wastewater treatment).

Used Oil: Any oil that has been refined from crude oil, used, and, as a result of such use, is contaminated by physical or chemical impurities.

Waste Codes: EPA identifiers for hazardous waste consisting of one letter (D, F, P, U, or K) and three numbers.

Waste Description Logs (WDL): A written description prepared by the generating Activity of the waste which includes: names, quantities, and National Stock Numbers (NSNs) of HMs used (See the activity's AUL); names and quantities of non hazardous materials used; and a description of the process used to generate the waste. The TCFE Form 646 will be used.

Waste Military Munitions (WMM): A military munition is a "waste" military munition if it has been identified as: (1) A solid waste or (2) A hazardous waste. In general, WMM are hazardous waste when they exhibit the hazardous waste characteristic of ignitability, Corrosivity, reactivity, or toxicity; or are listed as a hazardous waste.

Waste Minimization: The reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored, or disposed. It includes any source reduction or recycling activity undertaken by a generator that results in:

- a. The reduction of total volume or quantity of hazardous waste;
- b. The reduction of toxicity of hazardous waste; or
- c. Both, as long as the reduction is consistent with the goal of minimizing present and future threats to human health and the environment.

Waste piles: Any non-containerized accumulation of non-flowing solid waste that is used for treatment or storage.

Waste Streams (WSs): are defined as a unique set of Solid Waste materials which are based on their chemical properties, physical properties, generating process, packaging, and designated disposal method.

White goods: Any stoves, washers, hot water heaters, refrigerators, freezers, or other large appliances.

Wholly Inert: Those munitions or munitions components that have never contained reactive materials (e.g., dummy munitions). Note: Once an item is employed as a component of a military munition, it is no longer considered wholly inert.

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REFERENCES

REQUIRED:

TCFE Reg 385-10: Fort Eustis and Fort Story HazCom Standard.

REQUIRED INSTALLATION PLANS:

Fort Eustis ODC Elimination Plan

Fort Story ODC Elimination Plan

Storm Water Pollution Prevention Plan

US Army Transportation Center Integrated Contingency Plan

US Army Transportation Center Pollution Prevention Plan, June 2002

REQUIRED INSTALLATION STANDING OPERATING PROCEDURES:

Standard Operating Procedures (SOP) for Antifreeze Recycling on Fort Eustis and Fort Story

Standard Operating Procedures (SOP) for Aqueous Parts Washers on Fort Eustis and Fort Story

Standard Operating Procedures (SOP) for Inland Technology Parts Washers on Fort Eustis and Fort Story

REQUIRED INSTALLATION HAND BOOKS:

Fort Eustis and Fort Story Environmental Management Handbook (EM HB), March 2003

Fort Eustis and Fort Story Integrated Solid Waste Management Handbook, Feb 2003

Fort Eustis and Fort Story Pollution Prevention Opportunity Assessment Handbook

Fort Eustis USATC HAZMART Informational Handbook

Fort Story USATC HAZMART Informational Handbook

Note: Installation Plans, SOPs, and Handbooks can be downloaded from the Environmental Web Site, https://dpw-web.eustis.army.mil/ENRD/ENRDHome/environmental-documents.htm or call Tel 878-4123 x293.

RELATED PUBLIC LAWS and ACTS:

Public Law 94-580, Resource Conservation and Recovery Act (RCRA) of 1976, as amended

Public Law 96-510, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended

Public Law 92-500, Federal Water Pollution Control Act (CWA), as amended

Public Law 94-469, Toxic Substances Control Act (TSCA), as amended

Public Law 91-190, National Environmental Policy Act (NEPA) of 1969, as amended

Public Law 102-483, Section 326, Elimination of Use of Class 1 ODSs Superfund Amendments and Reauthorization Act (SARA) of 1986

Emergency Planning and Community Right-to-Know Act (EPCRA), of 1986

Public Law 94-580 Pollution Prevention Act of 1990

Federal Facilities Compliance Act (FFCA) of 1992

The Pollution Prevention Act of 1990

The Clean Air Act Amendments of 1990

RELATED EXECUTIVE ORDERS:

Executive Order 12843: Procurement Requirements and Policies for Federal Agencies for Ozone-Depleting Substances (21 Apr 93)

Executive Order 12844: Federal Use of Alternative Fueled Vehicles (21 Apr 93)

Executive Order 12845: Purchasing Energy Efficient Computer Equipment (21 Apr 93)

Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (11 Feb 94)

Executive Order 13031: Federal Alternative Fueled Vehicle Leadership (Amends EO 12844, Replaced by EO 13149)

Executive Order 13101: Greening the Government through Waste Prevention, Recycling, and Federal Acquisition (14 Sep 98) (Replaces Eos 12995 and 12873)

Executive Order 13123: Greening the Government through Efficient Energy Management (8 Jun 99) (Replaces EO 12902)

Executive Order 13148: Greening the Government through Leadership in Environmental Management (22 Apr 00) (This EO revokes EO 12843, EO 12856, EO 12969, Section 1-4 of the Pollution Control Plan of EO 12088, and the Executive Memo on beneficial landscaping dated 4/26/94)

Executive Order 13149: Greening the Government through Federal Fleet and Transportation Efficiency (21 Apr 00) (Replaces EO 13031)

Executive Order 13150: Federal Workforce Transportation (21 Apr 00)

Executive Order 13186: Responsibilities of Federal Agencies to Protect Migratory Birds (10 Jan 01)

Executive Order 13221: Energy-Efficient Standby Power Devices (31 Jul 01)

RELATED CODE of FEDERAL REGULATIONS:

Title 29 CFR 1910.120 - Hazardous Waste Operations and Emergency Response

Title 29 CFR 1910.132 - Personal Protective Equipment (PPE) Standard

Title 29 CFR 1910.133 - Eye Protection

Title 29 CFR 1910.134 - Respirator Standard

Title 29 CFR 1910.176-1910.181, 1910.184, and 29 CFR 1911 - Materials Handling and Storage

Title 29 CFR 1910.1025 - Lead Standard

Title 29 CFR 1910.1001 - General Industry Standard for Asbestos

Title 29 CFR1910.1200 - Hazard Communication standard (HAZCOM)

Title 29 CFR 1926.1101 - Construction Standard for Asbestos

Title 40 CFR 61 - National Emission Standard for Hazardous Air Pollutants (NESHAP)

Title 40 CFR 68 - CAA Section 112(r), Accidental Release Prevention

Title 40 CFR 82.156 -

Title 40 CFR, Parts 260-281 - Hazardous Waste Management

Title 40 CFR 355 - EPCRA list of extremely hazardous substances (EHSs)

Title 40 CFR 370 - EPCRA Emergency and Hazardous Chemical Inventory (Tier Two report)

Title 40 CFR 372 - EPCRA Toxic Chemical Release Inventory (TRI) Report

Title 40 CFR, Part 745 - Lead-Based Paint

Title 40 CFR, Part 761 - Polychlorinated Biphenyls (PCB)

Title 40 CFR 763 - Asbestos

Title 49 CFR, Parts 100-199 - Transportation

RELATED COMMONWEALTH OF VIRGINIA REGULATIONS:

Virginia Hazardous Waste Management Regulations (VHWMR)

Virginia Solid Waste Management Regulations (VSWMR)

Virginia Lead-Based Paint Activities Regulations

Virginia Asbestos Regulations

Virginia Department of Health Regulations

Virginia Erosion and Sediment Control Law, Regulation and Certification Regulation (VESCL&R)

Virginia Department of Environmental Quality, Water Division, Office of Spill Response and Remediation Regulation 9 VAC 25-580-40, Underground Storage Tanks: Technical Standards and Corrective Action Requirements

Virginia Department of Environmental Quality, Water Division, Office of Spill Response and Remediation Regulation 9 VAC 25-91-10 et seq, Facility and Aboveground Storage Tank (AST) Regulation

Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution, 9 VAC 5-80

Virginia Waterworks Regulations, 12 VAC 5-590

RELATED DEPARTMENT OF DEFENSE PUBLICATIONS:

DOD Regulation 4160.21M, Defense Reutilization and Marketing (DRMO) Manual

DOD Regulation 4145.19-R-1, Storage and Material Handling

DOD Regulation 4500.9, Defense Transportation Regulation

RELATED ARMY PUBLICATIONS:

AR 11-34, The Army Respiratory Protection Program

AR 200-1, Environmental Protection and Enhancement

AR 200-2, Environmental Effects of Army Actions

TM 38 - 410, Storage and Handling of Hazardous Material

TB 43-0134, Battery Disposition and Disposal, w C1, 25 Jan 94

TB MED 513, Occupational and Environmental Health Guidelines for the Evaluation and Control of Asbestos Exposure